Data Submitted (UTC 11): 5/24/2024 4:00:00 AM First name: Beverly Last name: McKnight Organization:

## Title:

Comments: Concerning the Jellico Mountain logging project I have several issues with the proposals. One of the first concerns is in regard to who is doing the logging. I understand that the logging companies that will be doing this must have certain insurances in place to do this job. It is also my understanding that for the 2021-2022 campaign cycle a logging company in McCreary County, Stephens Hardwood, contributed \$10,000 to the Hal Rogers election (https://www.opensecrets.org/members-of-congress/hal-rogers/contributors). This contribution was made before the Forest Services announcement of this massive logging project in 2022. Interesting timing. Stephens Hardwood is one of very few local logging companies that would be able to participate in this project. Again, interesting timing between contribution and logging project development.

The next concern I have is one of clearcutting. In the United States schools we teach our elementary students the dangers and causes of erosion. Clearcutting fits right in this area. To remove all timber from an area eliminates the structures holding the ground in place. To remove so much of the timber, and other vegetation in the process, we are opening up the steep slopes of Jellico Mountain for massive landslides and flooding in areas that are already prone to flooding. When I moved to my current residence I did not have floods. However, in 2005 my property flooded. Residents of this community who were 70 years old said that this had NEVER happened. The reason-logging near me. Now, I have 1-3 floods a year. Two of these in the last week.

Number three. The original proposed project includes clearcutting on at least 200 acres of old-growth forest (over 130 years old)! Despite meeting the Forest Service's tree size and age requirements for old growth none of this older forest is protected in the Jellico's "Designated Old Growth" area. Kentucky Heartwood's field work is ongoing to ground-truth the parts of the forest proposed for heavy logging, so there could be more old growth to discover. President Biden issued an Executive Order in April 2922 to preserve mature and old growth forests.

These mature forests draw down greenhouse gasses as they grow older, contrary to outdated forest models still promoted by the Forest Service and wood products industry. Even though young trees can grow quickly, logging results in an overall net release of greenhouse gasses to the atmosphere over many decades to come. While some wood products serve as long-term greenhouse gas storage, logging releases large amounts of greenhouse gasses through transportation, milling and mill waste, soil disturbance, decomposition of slash (tree tops and branches), and other mechanisms. Those greenhouse gasses take decades or longer to be captured again by new tree growth - time we don't have given current climate models and trajectories. This project will result in major greenhouse gas emissions that will not be offset by growth during the 40 years of the proposed project.

Still another concern related to the cutting of old growth is the number of species, endangered or not, that depend on these stands for a livable environment.

Planning a logging project over 40 years? Too many things will happen during that time to make this a practical project. This plan is not compliant with the National Forest Management Act (NFMA) or the National Environmental Policy Act (NEPA). Before any more logging in this area occurs the DBNF should update their Forest Plan to adhere to the 2012 Planning Rule. The Jellico Mountain

Project should be scrapped until all questions and concerns are answered and an updated and more environmentally friendly plan can be studied and developed that will be of benefit to all concerned.

I vote to do nothing until the plan has more study and development done. Since I expect that to not be an option I think

Alternative 1 is the next best plan. The original plan should be thrown out and never looked at again. Clearcutting should be erased from the forestry vocabulary.