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Title:

Comments: I'm writing today to express my opposition to the Jellico Vegetation Management Project. While I appreciate that the Environmental Assessment includes an alternative, in response to such an outpouring of scoping comments, that shortens the timeline and reduces the amount of total logging (though without any guarantees that future projects in the same area won't simply be approved over the next forty years), I was extremely disappointed by the superficial and inadequate ways the concerns of the public were addressed. I know that there are powerful mandates coming from the upper echelons of the Forest Service, and that local staff are probably feeling super torn between the clear desires of the most impacted communities, and the demands of higher management. I truly hope that y'all, as individuals, remember that you're part of this community and find your way toward careful stewardship of our land, versus succumbing to these dramatically increased timber targets that are obviously (and confirmed in FOIAed emails) driving current Forest Service decisions.

As is always the case with these projects, the failure of the Forest Service to consider the age and successional stage of the privately deeded land intermingled with national forest land undermines the relevancy of age class data as it pertains to ecological diversity on a landscape scale. And with the Executive Order to conserve mature and old growth forests-acknowledging their now-uncontroversial role in carbon sequestration in this age of climate crisis-it's especially disheartening that so little of the documented mature and old growth-and forest on the verge of qualifying-has been removed from the proposed project (and, based on previous experiences elsewhere in the Boone of FS personnel conducting inaccurate ring counts and averaging individual tree age for a supposed stand age, it's hard to feel confident in the data). The Forest Service (and specifically y'all responsible for the care of our local forests) is in a position right now to make a difference for the people who come after us-human and otherwise. Please don't let short term timber targets undermine our future.

As an amateur but enthusiastic birder, I'm extremely concerned about the impacts of this scale of logging (under both the Proposed Action and Alternative One) on the cerulean warbler and other bird species who need uninterrupted tracts of old forest for their summer habitat. There is absolutely an adequate amount of early successional habitat to meet their needs during the part of their life cycle that utilizes it (and wouldn't it be nice if more of that came from beaver meadows and less from logging!) but the unfragmented mature and old growth crucial to successful breeding is put at risk by this project. I fail to see how the EA adequately addresses their needs (as I believe is mandated by the Forest Plan). Also, the plan to apply herbicide to native grapevines, whose presence is associated with nesting success of cerulean warblers, makes me furious and is such a glaring example of managing our national forests like tree farms for future harvest versus native habitat for the many species who rely on them as home. Indiana, long-eared, and tricolored bats are among these species who respond very poorly to clearcuts (including regeneration and the high-harvest "shelterwood" cuts planned for Jellico) and the EA just doesn't adequately address their needs.

I'm equally-perhaps even more-concerned about aquatic species, such as the Cumberland darter, blackside dace, and Cumberland elktoe mussel. There haven't even been comprehensive surveys of Jellico Creek in nearly twenty years! It's absolutely appalling that this project could move forward without even conducting current surveys and granting thorough consideration of these federally listed species.

And water, of course, brings us to sedimentation, and landslides, one of the biggest concerns expressed by the local community as well as those with more general interests. The EA is absolutely insufficient here. I recently read a report by the former director the Kentucky Geological Survey that does an excellent job of outlining the many and varied ways the FS fails to take these concerns seriously-as has been the case elsewhere on the Boone with catastrophic impacts to land, water, and forest recovery (Redbird Group One project comes to mind). It's extraordinarily irresponsible of the FS to push forward based on such superficial and non-site-specific claims and a clear failure to use the best tools available for these assessments. These concerns are anything but abstract to the people of Kentucky, who have, in just the past few years, experienced massive floods and slope destabilization that has resulted in loss of homes and lives. Please don't let this happen in Jellico.

I was disappointed (and honestly somewhat disgusted) to read in the EA that, while the FS acknowledges the extremely problematic current invasion of tree of heaven and other exotic colonizers, the claim was made that if the "No Action" alternative were to be adopted, the FS would make no real effort to address this existing problem. Instead of creating the precise conditions under which invasive species spread, then claiming you need the logging roads to access the areas for future controls, I surely wish you'd consider taking responsibility for past management decisions and mitigating the harm that's already been caused by logging in Jellico-even if you have don't have a convenient new road to take you in there. I'm also really not reassured that invasive species resulting from new logging would be appropriately mitigated given the written intent to neglect current infestations if the overall project isn't approved. I know that there are so many FS employees who came to this career out of a genuine desire to care for the forest, and it must be so hard to keep that alive under the pressure to meet timber target goals from DC, but there are things our forests need from us: and addressing the ecological catastrophe of invasive species (versus inviting them in) is a big one.

Please listen to the community, do your best to be part of this community versus tools of the bigwigs in Washington, and step back from this proposal. Invest in responsible recreation, climate change mitigation through preserving and nurturing old forests (actual old forests are a tiny percentage of the Boone), preservation of habitat for a diversity of species (not just a couple popular game species!) and holding OUR public lands in trust for future generations.