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Comments: Tim Reed, District Ranger

Stearns Ranger District

Daniel Boone National Forest

3320 Highway 27 North

Whitley City, Kentucky 42655

RE: Jellico Vegetation Management Project Draft Environmental Assessment

May 24, 2024

Dear USFS,

When you look at a map of global forest cover you realize how precious and limited our eastern deciduous forests are. They are a powerhouse of climate stability, producing oxygen, sequestering carbon, conserving water, cooling the planet. On top of that they house wonders of biodiversity, from soaring old trees to hidden fungi and soil dwellers. The still unknown relationships among its species are the source of scientific fascination and possibility. Beyond that, being a visitor to an intact forest like Jellico offers opportunities to feel magic and mystery. The Daniel Boone National Forest's Jellico Mountain is a natural wonder, one that should be cherished and studied and protected, for no amount of money could reproduce it once it is gone.

It is shocking, therefore, to hear of your agency's plans to level the heart of the forest on this mountain. And that the logging proposed is so extensive that it will take 40 years to complete. 40 years? In this time of climate crisis when every moment is crucial to holding back the worst effects of climate change? 40 years is an unthinkable timeframe in our current context, one that suggests that the US Forest Service is either completely ignorant or greedy or both.

Given the overwhelming public opposition to this project at the scoping phase, it appears that your agency is also tone deaf to the public that you are supposed to serve.

I can assume that most of you reading this letter studied some aspect of natural resources and joined the Forest

Service because you enjoyed the outdoors or loved the forest and its wildlife and waters. At what point did you lose your bearings? Have you visited Jellico and looked up at its trees? Or looked down at its wildflowers? Or felt its cold waters or heard its birds sing? Have you felt the passion of the people who love this forest? Was it easy to ignore all our comments or did it prick your conscience?

What about the climate science that speaks of protecting mature forests as a first line of defense against climate change? Or your president's Executive Order calling for mature and old growth trees to be protected? Or the soil studies that show the instability of the slopes on Jellico? Or your own Forest Plan that calls for establishment of Cerulean warbler habitat in Jellico? Did you feel for the people of Eastern Kentucky that were inundated by devastating floods two years ago? What if you create a repeat scenario in Jellico? Is it too much to ask a federal agency to connect the dots between forest cover, slope stability, and flooding?

The public is outraged at your willful disregard of science, the public, and common sense. The Jellico EA and decision-making process should be suspended until your agency does due diligence to the law, the public, and the species that you are entrusted with. Neither alternative satisfies your obligations under the law.

As the first director of Kentucky Heartwood, I have hiked extensively in the Daniel Boone. I have visited countless timber sales marked for cutting. I have also seen the aftermath of that cutting. "Of course it's going to look bad at first," natural resources professionals will generally tell members of the public who haven't been "educated" in their field. Yes, things do green up after a few years and the scars and soil damage of the logging and skid roads are covered up. But superficial glances belie the deeper damage registered in fragmentation of intact forests, reduction of reproductive success of interior species, deterioration of forest relationships, erosion and sedimentation, damage to soils, compaction, infestations by invasive species, increase of water temperatures and subsequent loss of aquatic habitat, loss of old growth and forest complexity, flooding, and increased incursions and damage by ATV use.

I submit that the EA must study these above listed deleterious impacts to Jellico that the "vegetation management" would precipitate.

There are plenty of old logging sites on the Daniel Boone that would be instructive if your experts want to seek to understand the effects of cutting Jellico. You could pull the files of some of your old "habitat enhancement" projects that sought, for example, to promote oak/hickory forests. Then go out in the field like I have many times and see what change your agency has wrought. More often than not you will see infestations of more than one invasive species; dominance of maple regrowth; shelterwood trees dead, damaged, or dying of injuries from logging equipment; rutted roads and skid trails; increased temperatures; depauperate soils; compaction; trash; and decreased forest diversity.

Your agency has been logging the Daniel Boone since the 1980s. Where are your studies of the impacts of that logging? The EA for Jellico should have plentiful references to site specific results of vegetation management

projects across the forest. Monitoring effects is the assurance made in each and every one of your past projects. In fact, it is mandated by the National Forest Management Act and the National Environmental Policy Act. Where are your studies assembling and analyzing that data? Do they not exist? Have you been so busy planning timber sales and meeting quota that you haven't been able to follow through with that aspect of your federal obligations? Site visits with a clipboard and an educated eye could give you important information that is missing from your EA.

There are many critical needs on the Daniel Boone. Recreational facilities and trails are deteriorated. Old wells and mine sites need remediation. Illegal ATV use needs to be stopped and damage from ATV trails needs to be repaired. Invasive species need to be removed. Logging roads need to be closed and revegetated. Monitoring needs to be conducted. Illegal dump sites need to be cleaned up. Forest boundaries and trail signs need to be remarked. Imperiled species need recovery efforts. The public needs to be educated and engaged.

Your agency is supposed to be a multiple use agency. Why then do you emphasize logging above all other uses and often to the detriment of those uses?

Please pull the Jellico EA until you can demonstrate compliance with President Biden's Executive Order and fulfill your other obligations under the law.

Sincerely,

Chris Schimmoeller

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