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I am filing this Notice of Objection pursuant to Title 36 CFR Part 218, in regard to the Jellico Vegetation Management Project in the Stearns Ranger District of the Daniel Boon National Forest, where the responsible office is Kyle Edmonds, District Ranger.

District Ranger Kyle Edmonds's decision to go ahead with the very extreme Proposed Action logging plan is explained in a three paragraph Draft Decision Notice extraordinary for its
(1)lack of any serious regard for scientific studies, empirical evidence, or local history,
and
(2) deafness to the loud public outcry the Proposed Action plan has caused.

Mr. Edmunds fails to even mention Alternative 1, the less extreme, alternative plan that Forestry offered to the community in the face of strong opposition against the Proposed Action. Alternative 1 was extremely well supported by the community, as documented in Comments, as a compromise between the Proposed Action plan, most favored by timber interests, and their Alternative 2, a do-nothing option attractive to tree-huggers like myself. I backed Alternative 1, in the spirit of compromise. So did many others, in the spirit of compromise. But Mr. Edmonds now seems to be pretending that Alternative 1 was never offered. Very cynical.

Mr. Edmonds's Decision Notice to stick with the original Proposed Action plan also fails to address any - not a single one - of the concerns I listed in my Comments submission made regarding this Project on 11/22/2022.

My concerns included:

The steepness of the terrain means landslips and erosion will be caused by logging actions, logging road construction, and removal of the canopy.

Logging is a threat to endangered species and damages the local ecology.

A devastating ugliness is created by clear-cutting, accompanied by deflation of land values of adjacent private properties, and a loss of aesthetic value of the entire area.

Clearcutting allows invasive species, in particular tree of heaven and kudzu, to further proliferate and encroach into new areas. The plan lacks methodology for controlling these invasives.

The logging of mature forests destroys valuable carbon sinks, bulwarks against global warming.

All these concerns and more were expressed by hundreds of others who filed formal comments, including an in-depth submission by Kentucky Heartwood. Mr. Edmonds merely says he has considered "public comments received."

The only issue Mr. Edmonds attempts to justify in any detail is the extraordinary length of the Proposed Action operation, a whopping forty years. He is correct in saying forest management is a long-term process. However, the longevity of a forest or a tree does not explain why he is so intent on logging almost ten thousand acres (1) concentrated in a relatively small region, and (2) over a protracted period of 40 years. This is callous and cruel to residents of this area. It's like they've been found worthy of cruel and extraordinary punishment. Project maps clearly indicate that many homes, until now nestled among beautiful forests, will soon be totally surrounded by

bare, scarred mountain slopes. For forty years they will have to deal with noise pollution, roads damaged by heavy log trucks, erosion, muddied creeks, and landslips. The value of their land will fall, and will not recover for two, maybe three generations. A project length of forty years is not fair and is in no way justified by the fact that trees have long lives.

By contrast, Alternative 1 - the strangely vanishing Alternative 1 - reduced the logged area from 10,000 to 3,000 acres and reduced the project length from 40 years to between four and six years. Alternative 1 had something for everyone. It was doable. And it has vanished?

Mr. Edmonds estimates that a forester holds a given job position for "around four years." This means his 40 year plan will dictate to the next TEN District Rangers into the future, until 2066. Will future District Rangers be able to modify the plan if circumstances demand it? I fear not. It seems to me, the forty year aspect of the plan is a power grab by those in the Forest Service who view trees only as lumber. Mr. Edmonds describes the project as "a set of tools that can be utilized by future foresters," but it's more like a weapon that, once in place, can give the Forest Service an inordinate amount of control over publicly owned forests well into the future.

In the next part of my submission I will address issues that arose AFTER the previous designated opportunity for formal comment.

THE HARDWOOD LUMBER INDUSTRY IN KENTUCKY IS IN A SLUMP.
In an article in The Courier Journal on February 8, 2026, James Wells, whose family owns GreenTree Forest Products in Fleming County, KY, writes that the hardwood industry in Kentucky is on the brink of collapse due to lack of demand. He writes that the American Hardwood Export Council reports exports are down one third since 2018, while global consumption of United States hardwoods has shrunk by a half. Prices for red oak, yellow poplar and ash are low. Receipts do not always cover the cost of harvest. Sawmill closures are now common. Over-reliance on exports to China is one reason for the collapse, as this market has dried up in the face of the tariff debacles. Only white oak and black walnut are holding value - but white oak prices depend on the bourbon industry, which is facing a slump of its own - see below.

In this climate of slumping demand, it is unconscionable to harvest a public forest consisting of mixed tree species, like the Jellico Mountain forest, for two reasons.

ONE, if a public forest is opened to logging bids in times of over-supply, it will only exacerbate a bad situation. The effect will be to increase supply and therefore further suppress prices and make things worse for private forest owners. It's not as if we the public can't afford to forego earnings from timber sales. Who do we think we're kidding? We never get a cent from Forest Service timber concession sales anyway! If Forest service leaves the trees standing for now, no one loses. If they advertise for bids now, bidding will be low and the Forest Service will miss out on revenue.

TWO, logs harvested from the forest and stockpiled to await sale may well rot before they can be sold!. Even if a few stave-grade white oak logs could be sold, the rest of the harvest may be unmarketable. What a terrible waste that would be! On top of all the environmental devastation to the forest land, on top of all the equipment noise pollution, and damage to rural roads, and endangerment to rare species, for harvested logs rot away to nothing would be an unforgiveable tragedy. I urge all logging to be paused until the timber market recovers! EACH TIMBER HARVEST MUST MADE CONTINGENT ON DEMAND. Given current depressed business conditions, logic demands that (the timber harvest demands of the One Big Beautiful Bill Act notwithstanding) logging operations be postponed for now.

CURRENT DOWNTURN IN DEMAND FOR KENTUKY BOURBON MEANS LESS DEMAND FOR WHITE OAK
The almost meteoric rise in bourbon sales over recent years meant a sharp increase in demand for quality while

oak for barrel manufacture. One high quality 80 year old white oak yields staves for only three barrels. According to Kentucky Bourbon Trail, in 2022 Kentucky produced 2.7 million barrels of bourbon. All barrels must be new, not re-used, in order to be deemed bourbon. 2.7 million barrels divided by three barrels per white oak equals 900,000. That's how many mature white oaks were harvested to satisfy one year's demand for barrels. Given the economic importance of the bourbon industry in Kentucky, it is assumed that industry and government leaders pressured the Forestry Service to open up public forests to logging. But times have changed. Domestic sales of bourbon have dropped. So have exports in the face of retaliatory tariffs. Bourbon production is at a low ebb. For example, Jim Beam has completely shuttered one of its distilleries for a whole year. Some bourbon companies have gone broke, many are reporting 25 to 28% lower sales. Accordingly, demand white oak barrels has fallen, and with it, the price of white oak.

The Jellico Vegetation Management Project's Proposed Action was drafted at the height of the bourbon boom, when demand for white oak was tremendous. But now, in 2026, that demand is somewhat less. Concurrently, there is very low demand for poplar, red oak, and other trees found in the mixed forests of Jellico Mountain. These realities must be factored into any logging plan. I believe it would be wise to ratchet back the scope of the Proposed Action plan and delay its commencement date. In this light, long-lost Alternative 1 looks better and better.

THE GROUSE HUNTING LOBBY
Of the many hundreds of comments submitted until now, practically the only comments made in support of the Proposed Action were posted by grouse hunters or grouse hunting organizations. The relatively high volume of these posts may give the impression that the Proposed Action is supported by a meaningful fraction of the public. But this is not really so. Grouse hunters are of course members of the public, but grouse hunters who submitted comments live far from Whitely and McCreary Counties. They were not predominantly members of the local public communities. They don't have to live with the mess that the Proposed Action will undoubtedly create. If comments made by grouse hunting interests are eliminated, the majority of submitted comments were against the Proposed Action.

At any rate, grouse hunters have a conflict of interest that should discount their opinions: grouse hunting organizations are known to receive funding from the Forest Service. They have a you-scratch-my-back-I'll-scratch-yours relationship with the Forest Service.

Also, the grouse hunting lobby has a very narrow focus. They want more grouse habitat so their members can shoot more grouse. Therefore, they can be depended upon to support any logging project whatsoever, because forest regrowth makes good grouse habitat. But they do not take any other effects of logging under consideration. They want mature forests to be destroyed so they can grow more grouse - to then destroy. (If they shot with cameras, instead of guns, grouse populations would have a chance to recover. But this idea has not caught on.) I am not anti-gun or anti-hunting. I own guns, plural, and I give a friend hunting rights on my farm. It's just that I don't think it's fair for grouse hunting organizations far and near to get their members to flood the comment box with favorable comments when they'll probably never ever even visit our counties.

Once grouse hunters' comments are removed, it becomes clear that local opposition to the Proposed Action far outweighs local support.

The good news is, Alternative 1 was very popular, and will be again - if you choose to revive it.

Thank you for the opportunity to have a say.
Please study my arguments, Mr. Edmonds, and in the light of public sentiment and current economic conditions please consider reinstating your popular compromise plan,
Alternative 1. This plan would still allow you to work toward accommodating the directives of the OBBBA, while simultaneously preserving the pride and morale of our county communities.

Adriana Lynch