Data Submitted (UTC 11): 3/7/2026 11:22:16 PM
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Title:
Comments: Notice of Objection filed pursuant to Title 36 CFR Part 218

Name of project being objected to: Jellico Vegetation Management Project #63037 in the Stearns Ranger District of the DBNF

Responsible official: Kyle Edmonds, District Ranger

Ranger district: Stearns Ranger District, Daniel Boone National Forest

Statement of the Issues - Objections:

I am a concerned citizen of Whitley Co., KY, a taxpayer, and an educator in the university system who has written twice (12/5/2022 and 5/14/2024) to voice grave concerns regarding the Jellico Vegetation Management Project #63037 in the Stearns Ranger District of the DBNF.

To date, 994 comments have been made on this project, with the vast majority opposing the proposal. The number of comments indicates the breadth of concern this project raises. Economic, environmental, ecological, cultural, and aesthetic issues have all been voiced. Public meetings with the Forest Service made clear the degree of concern among those who would be affected. In response to the worries expressed, the NFS proposed an alternative compromise plan (Alternative 1) that would substantially reduce areas of partial and complete clear-cutting, addressing many of the major concerns raised during the meetings. The community felt "heard." Alternative 1 was a plan evidently acceptable to the NFS and acceptable to the community. It was with shock and dismay that I read Mr. Edmonds' report (Draft Decision Notice…), stating in the first paragraph,

"I have decided to implement the Proposed Action as described in the Jellico Vegetation Management Project Environmental Assessment (EA, page 7) which includes approximately 931 acres of clearcutting, 1,805 acres of Two-Aged Shelterwood harvest, 2,434 acres of deferment harvests, 4,367 acres of thinning, and additional intermediate treatments as listed in Table 1 of the EA. Project activities are expected to occur over the next 40 years… _and [in] consideration of collaboration and public comments._"

Alternative 1 was discarded without even a mention. The original project proposal was accepted without modification.

While many valid objections have been made by others (see endnotes 1, 2, 3) I will focus my objections on the points I made previously. Evidently, they had no impact on the final decision. This does not diminish their significance or truth. For brevity, I will summarize with numbered points:

1.Carbon. Old even-aged trees (those proposed to be cut) store vast amounts of carbon. Cutting of these trees releases carbon dioxide…
a.if the trees are burned or the waste decays.
b.from the trucks and chainsaws used in the felling.

2.Erosion. Existing forest holds soil in place. Exposed soil from cut trees is vulnerable to drying and erosion until forbs lock the soil in place, leading to…

3.Fouled streams. Soils and debris from runoff will interfere with natural stream flow, clouding the water and

interfering with aquatic organisms.

4.Ecological succession. There are many surrounding private lands in various stages of ecological succession (a major concern of the project). Addressing a comment made to this objection, it is true that the Forest Service has no control over private lands. Yet there are so many acres of fallow land or land in different forest stages that this should be of no concern unless the concern lies in the NFS not having control over timber production.

5.Habitat fragmentation. Creating large areas of clear-cut will result in greatly reduced habitat for species needing large forest territories.

6.Soil compaction. Tractors, skids, and logging trucks will compact soils.

7.Road damage. Heavy logging trucks and tractors will damage roads. Addressing this objection, the comment was "impacts to non-Forest Service owned and maintained road systems are outside the scope of this project." In other words, road damage caused by their project is not the NFS's concern.

8.Education. The proposed project will remove forest ecosystems used in the teaching of college dendrology, ecology, plant biology, plant taxonomy subjects and courses. The DBNF has been an extraordinary outdoor educational opportunity for students that is in danger of being destroyed.

9.Aesthetics. I list this last, not because it is least important, but rather it addresses what we would be left with: ugly, scarred land. To an Appalachian, forested land is part of their heritage and culture. The isolation, ruggedness, and beauty of the mountains is what brought their ancestors here in the first place. You would be taking this away from them.

I understand that national forests are, by law, multipurpose, and part of that purpose involves the production of timber. I am certain that those in the NFS are good people, convinced that they are doing what is legal and right and in the best interests of the public and their profession. Yet we profoundly disagree about what those best interests are and how they should be achieved.

Please, reconsider Alternative 1!

Endnotes:
1. Adriana Lynch, 3/5/2026. An articulate summary of the concerns and damage that would be done.
2. Theresa Martin, 3/5/2026, Devastated and Dismayed. A feeling of betrayal by the NSF on behalf of the people in McCreary and Whitley Counties, KY.
3. Timm Martin, 12/5/2022. Jellico Mountain Project Feedback to USFS. A detailed summary (pp. 9-24) of the environmental and community concerns of this project.