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

Like more than 900 others from the general public providing input and feed-back since the inception of the Jellico Vegetation Management Project, I attended the public meetings and submitted my concerns. There are no changes in my views or concerns about this project. As side note: I find it ironic that although the McCreary Journal is the newspaper of record, the majority of the forest to be impacted by this project is in fact located in Whitley County. So, how many folks living in Whitley County did not see the advertisement?

For the record: in the comments I submitted on May 24, 2024, by reference, I referred to the comments that I submitted on December 4, 2022. Then, I continued with may rationale as to why I object to the proposed 40 year project. So, all of my previous comments are still valid.

I feel certain that the vast majority of those responding, excluding outsiders promoting Ruffed Grouse habitat, were supportive of the offering of two alternatives by the USFS, particularly the quite popular Alternative 1. I ask the USFS to explain why you have totally ignored public input and abandoned Alternate 1. Alternate 1 is a win-win for everyone and does offer strong possibilities of a second look in the event that the FONSI results are horribly wrong, which will be proven to be the case.

Anyway, in the public comments that I submitted on May 24, 2024, I covered the following concerns, topics, etc., with rationale summarized as follows:

Ruffed Grouse (grouse): The DB National Forest can be entirely decimated in a fashion that would provide the maximum habitat for grouse but would be unsuccessful. Why? Because habitat loss is not why grouse have disappeared from the area. As rationalized previously, the habitat has not changed so negatively over the past 25-30 years to the extent that grouse virtually starved out, no way. In fact, considering the vast private properties adjacent to the DB Forest that have been logged over during the last 25-50 years as well as the hodgepodge cuts in the project area by the USPS, the grouse habitat is basically the same today, if not better. In my opinion, the absence of the grouse has zero to do with habitat, thus, this logging project will have no positive benefit for grouse.

Elk: Elk cannot survive in the project area alone. As previously rationalized, supporting Elk will require the adjacent private properties.

Bear: Bear need acorns as part of their diet. As mentioned in those previous comments, officials in the Smoky Mountains National Park have been concerned about the loss of white oak trees due to winter storms and other reasons. It takes years for a white oak to produce acorns as well as any other acorn producing tree. Thus, clear-cutting will be detrimental to bear habitat for years to come.

Bats, flying squirrels, grey squirrels, red squirrels, woodpeckers, racoon, opossum, nuthatches, chickadees and other animals and bird: As I previously stated, they all need older trees, particularly hollow trees for nesting and winter dens. Clear-cutting totally eliminates these trees and in many instances, "control burns" destroy the dead hollow trees as well. I recently found a dead Eastern Box Turtles in a DB Forest "controlled burn" off Williamsburg Street in McCreary County.

Flora Bio-diversity: As I stated, in part, "....all of the property (both public and private) in McCreary and Whitley Counties will rival the Smoky Mountains with respect to its floristic diversity." Clear-cutting, road building, and the introduction of chemical treatment (herbicides) will prove to be devastating to the flora bio-diversity of the affected areas. The use of chemicals alone have a strong potential to negatively affect the aquatic life in the valley streams. Keep in mind every acre of DB Forest in the designated project area drains onto and through private lands and then into streams of the Commonwealth of Kentucky. Jellico Creek drains into the Cumberland River up stream from a "wild river" designation. The FONSI obviously ignores this fact.

Aquatic threatened or endangered species: These are the streams that will receive negative aquatic impact due to this 10,000 acre project, Jellico Creek, Rock Creek, Bucks Branch, Ryans Creek, Hayes Creek, Marsh Creek, Wolf Creek and Little Wolf Creek to name a few as well as Cumberland River which was previously mentioned. How can this be?

Honeybees: As previously rationalized, clear-cutting will totally eliminate any wild honeybee colonies. We all know the story about the honeybee and it's benefits to the human race. Established wild honeybee colonies have characteristics of disease resistance. This is a known fact in the practice.

General observations: In my previous comments, I raised concern about previous logging operations on the DB Forest within the project area. I'm sure these sites are well documented by location, date, logger(s), USFS staff, treatments, seedings, etc. These clear-cutting operation go back 50 years. For example: at the head of Criscillis Branch which can be accessed via Forest Service Road 6279. The far reaches of the right side of Criscillis Branch were "clear-cut" in 1976/77 as well as the north facing slope on the Ryans Creek side 10 years later, 1986. Has anyone from the DB Forest evaluated those two cuts? Are there any trees that appear to be at maturity in 31 years (50+31=81). The last time I was in these two areas, stump growth was predominate. The white pines that the USFS planted have not been a success. Does anyone have any idea the number and size of straight healthy trees that were slashed to the ground after the loggers departed? Was there any documentation of these slashed trees? I doubt it? There are other clear-cuts along Forest Service Road 6279 that fit this same description.

Invasive Species: As previously noted, invasive species concerns everyone. Right now, a drive along Hwy 92, up I-75, etc., you will see thousands upon thousands of Bradford Pear trees in full bloom! Wow! I did mention other invasive species such as, the tree of heaven, princess tree, kudzu, etc. None of those species were in the area when the USDA purchased the private property that's now DB National Forest. There is going to be an enormous challenge battling an explosion of invasive species over the next 40 years. Of course, no current DB Forest employee will be around to see how it unfolds.

Conclusion:

The number one question that the DB Forest managers have not address is: Why did you abandon Alternate #1?

Reducing the project acreage to 3000 would have been an excellent step in the right direction.
Reducing the project period to 4 - 6 years would have made it more realistic. As I stated, a shorter project time frame and acreage would provide ample time to observe and address the huge number of environmental concerns voiced by those following this proposed project. They will surely arise and we will be watching.

You've not given any consideration to the 177 acres of old growth from the project. Has there been an inventory to identify 100 year old and older trees in this area as suggested?

By implementing the "project" as proposed without any modifications is a slap in the face of the general public and those who have offered logical questions and suggestions. You do have within your authority to reconsider

Alternate 1. Considering the down turn in hardwood lumber demand, just maybe this would be an excellent option.

It is my hope that the DB Forest Service will reconsider its plan to go forward with the Proposed Action as described in the Decision Notice published January 2026 and adopt Alternative 1.

As a side note: In my opinion, the response rate to this last round has little to nothing to do with how those folks feel that responded during the previous comment periods. I think most folks thought it was over and the USFS would do as it desired anyway, and, no doubt, many folks never saw the Notice as I rationalized previously herein.

Respectively submitted.
Andrew D. Meadors