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Comments: This document is a Notice of Objection filed pursuant to Title 36 CFR Part 218

From: Terrell Holder, Conservation Chair, Sierra Club Kentucky Chapter

Regarding: Jellico Vegetation Management Project #63037, Daniel Boone National Forest: Stearns Ranger District, McCreary and Whitley Counties, Kentucky

Relevant to our comments submitted on May 24, 2024, our objections pertain to:

Problematic issues pertaining to landslides, slope stability, and sedimentation remain. We do not believe strict attention was given to impacts on water and aquatic ecosystems, forest habitat, careful identification of old growth and near old growth stands, and identification of slopes that must be avoided before any vegetation management project is finalized.

Passerine habitat destruction/loss, particularly habitat for the threatened Cerulean Warbler (Setophaga cerulea) was not adequately addressed. We do not see a balance between timber harvesting and habitat protection.

The timber targets that inordinately influence project design are still overzealous. There were no changes to the scope of the project regarding the acreage to be managed and the extraordinary long project timeline. We are concerned that timber harvest is the primary objective vegetation management above all else.

The scientifically documented importance of old growth/mature forest analysis is still lacking. Too many areas of old growth and mature woodlands are still in the project area set for timber harvesting.

Suggested remedies include:

Identify and avoid steep slopes that add sedimentation that harms aquatic habitat, increase flood risk, and the risk of landslides.
Identify and avoid woodland habitats by employing smaller, targeted areas of clear cuts and shelterwood activities, conservation of old growth stands, and more commercial thinning whenever possible. With a more targeted harvesting approach, habitat can be managed for species that need canopy openings, without massive cuts.
Reduce the time scale of the project to ten years and reduce the managed area harvest goals and methods employed to achieve a balance between harvest, habitat conservation, and other desirable public uses.

Conclusion,

We appreciate the opportunity to object to the scope and scale of this project. Considering the thousands of thoughtful and data driven comments received by the US Forest Service regarding likely harms, A Finding of No Significant Impact does not reflect reality. Significant harm is likely. We were hoping that the public input would reach open ears. That hope remains.