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Comments: To: John Hull, District Silviculturist, Stearns District, DBNF
Re: Jellico Vegetation Management Project
Notice of Objection filed pursuant to Title 36 CFR Part 218

Mr Hull, My objections continue to exist as stated in my comments from 5/24/2024. But the 2 topics I would like to highlight again are: 1. Mature and Old Growth, and 6. CEQ Interim Guidance and the Climate Crisis.

1. Old Growth. I still want to stress the importance of ACCURATELY identifying, and not logging mature (80-100 yr old) and old growth trees. Yes, there are issues with accurate identification.

a) "climate change is projected to have widespread impacts that will expand early-successional habitats" This has already happened with the tornado on May 16, 2025 that cleared approx 3150 acres in the DBNF, of which approx. 1943 acres was MOG, now it is early successional habitat. "intensive forest management...which includes clearcutting, thinning...interventions are, to date, mostly conceptual and experimental". "A prudent course would be to move cautiously with such novel strategies while expanding protection for mature and old growth forests which have a high degree of ecosystem integrity, genetic diversity, and adaptive capacity"
"Although 60-80 yr old trees may be termed 'mature' or almost 'overmature' they are at far less than half their natural lifespan and likely at far less than 20% of their potential carbon accumulation...There is considerable evidence that human created or maintained habitats do not provide the complexity, resilience and diversity over long periods of time that are provided by natural forest ecosystems" "Resetting a forest to age zero by clearing it reduces ecological complexity immediately because it prevents the full expression of structural and ecological diversity as well as myriad ecosystem services. Recovery is uncertain"
(from Forest-Clearing to Create Early-Successional Habitats: Questionable Benefits, Significant Costs, Kellett, M, 2023) file:///C:/Users/padra/AppData/Local/Temp/MicrosoftEdgeDownloads/3461f0a9-abd8-422b-8bb2-b839f199616c/ffgc-05-1073677.pdf

b.) In the United States "all federal lands combined represent the greatest (35%) concentrations of mature and old growth (MOG), 92% of which is on national forest lands, 9% on BLM, and 3% on national parks lands...The vast majority (76% of MOG on federal lands that store 10.64 Gt CO2) are vulnerable to logging. If federal MOG are logged over a decade, and half their carbon stock emitted, there would be an estimated 0.5 ppm increase in atmospheric CO2 by 2030, which is equivalent to 9% of United States total annual emissions" "By 2030, 74% of CO2 logging emissions would remain in the atmosphere, and by 2050 54% would remain" "Conversely, not logging these unprotected MOG would avoid the decadal logging equivalent of 0.5 ppm CO2 or 9% of the U.S. total annual emissions, which would make a meaningful mitigation contribution to the world" (from Mature and Old Growth Forests Contribute to Large Scale Conservation Targets in the Conterminous U.S., DellaSala, D, 2022) file:///C:/Users/padra/AppData/Local/Temp/MicrosoftEdgeDownloads/4205e3a5-7e60-4861-93f0-1433c606aada/ffgc-05-979528.pdf

6. CEQ Interim Guidance and the Climate Crisis: The decision of convenience to not us the CEQ guidance in the face of a climate crisis is disrespectful of the DBNF and the public you serve, and should please be reconsidered.

a.) "The planetary boundaries framework delineates the biophysical and biochemical systems and processes known to regulate the state of the planet within ranges that are historically known and scientifically likely to maintain Earth system stability and life support systems conducive to the human welfare...Planetary boundaries bring a scientific understanding of anthropogenic global environmental impacts into a framework that calls for

considering the state of Earth system as a whole" "On the basis of 2019 land cover classification maps derived from satellite observations, the current state of the regional biomes is similar to that in 2015 although, for most regions, the amount of deforestation has increased since 2015...there is little doubt that the global forest area continues to decrease." (from Earth Beyond Six of Nine Planetary Boundaries, Richardson, K, 2023) https://pmc.ncbi.nlm.nih.gov/articles/PMC10499318/pdf/sciadv.adh2458.pdf

b.) "lands reserved from logging in the Northeast have a net carbon sequestration rate that is roughly 33% higher than in logged forests and are projected to sequester more carbon over the next 150 years...the climate mitigation value of forest carbon lies not in the sequestration rate but in the total amount that is accumulated and kept out of the atmosphere. The power of forests in this process is unparalleled and far greater in old forests than in young forests, both above and below ground; carbon continues to accumulate for centuries. The amount of carbon lost when cutting a mature or old growth forest is not recovered by fast growing young forests for many decades to well over a century. One study found almost no net carbon accumulation for 15 years after clearcutting--currently a critical time window for reining in global greenhouse gas emissions...older forests...are better able to withstand physiological stress, and they are also more resistant to the stress of climate change than younger forests, particularly regarding carbon storage." "Forest clearing [clear cutting] can mobilize and release soil carbon for decades."
(from Forest Clearing to Create Early Successional Habitats: Questionable Benefits, Significant Costs, Kellett, M, 2023) file:///C:/Users/padra/AppData/Local/Temp/MicrosoftEdgeDownloads/3461f0a9-abd8-422b-8bb2-b839f199616c/ffgc-05-1073677.pdf

c.) "Compare with a recent study that estimated a potential increase in biomass of only 22%...our results indicate a potential increase of about 100% over current biomass stocks by 2100. Temperate Continental forests have greater potential to increase carbon stock over longer time periods than Subtrtopical Humid forests...scenario analyses showed that in the near term of 20-40 years, reducing harvest will yield the greatest reduction in net greenhouse gas emissions compared with business as usual." "Our estimated emission reduction from stopping harvest over the 73 million ha studied amounts to 117Mg CO_2 per year in 2050, equivalent to about 7% of the emissions from using fossil energy in the two ecozones. Increasing harvest would have the opposite effect of increasing emissions by a similar magnitude." (from Middle Aged Forests n the Eastern U.S. Have Significant Climate Mitigation Potential, Birdsey, R, 2023)

In conclusion, please reconsider your response in regard to accurately identifying and preserving mature and old growth sections of the forests of Jellico Mountain, AND also not use clearcutting as a method of treatment. Lastly, I still object to having a 40 year free for all plan, please scale this down to a 10 year plan. None of us will be here/working by then, and we will be foisting this plan onto some other poor soul to enact. 10 years is plenty. Thank you very much for considering and implementing my comments.

Patricia Draus