

Data Submitted (UTC 11): 5/17/2024 4:00:00 AM

First name: Deborah

Last name: Moses

Organization:

Title:

Comments: I want to offer my sincere appreciation for the work that has been done in order to present Alternative 1 for the public's consideration. The reduction of total acres proposed to be logged in Alternative 1, along with Alternative 1's elimination of the clear-cut method from the original proposal, shows that the comments presented to your agency indeed made a difference. However, I still have deep concerns with several aspects of Alternative 1. The fact that the total impacted acreage is significantly reduced is definitely a selling point for Alternative 1, but the accelerated schedule concerns me, primarily with respect to the hydrology and sedimentology consequences. Other concerns include, slope stability, use of herbicides, the impact on endangered and threatened species of plant and animal life, and overall forestry stewardship.

Hydrology/Sedimentology - In the Hydrology Effects Analysis Report, prepared by Mac Cherry (4/11/2004) an overall determination of the impacts of logging on the project area in Alternative 1 shows an overall increase in the sediment load anywhere between 2.8 and 8.7 times the baseline amount only for skid trails, skid roads, and temporary roads. It doesn't appear that any consideration is given to the long-term post-logging effects stump and root degradation and soil instability associated therewith. Moreover, the HUC12 watershed and the assumptions made for the modeling might not truly represent field conditions in smaller sub-watersheds, such as for Jackson Creek in southern Whitley County, where my property is located. An increase in the sediment load for this area, over an extended period of time, would likely cause the stream bed to fill with sediment and turn my property into a swamp. It is not clear to me whether an average runoff value was used for the entire project, but the steepness of the mountains above Jackson Creek, could possibly cause a higher sediment load than the numbers shown in the report. I am requesting that alternate sediment control, such as sediment fence, straw bales, or similar measures, be considered in areas being logged above my property. Additionally, the report states on Page 3, "A stream in the project area, Ryan's Creek, is on Kentucky's 303(d) list and the pollutants are total suspended solids and pH[ellip]". And subsequently says, "Research in Kentucky on timber harvesting and water quality showed streamwater pH was not affected by timber harvesting (Arthur et al., 1998), so impacts from the Project actions are not expected to contribute to Ryan's Creek impairment". Although the 303(d) list shows two sources of pollutants (pH and total suspended solids), no mention is made of the effect that the increase in the sediment load would have on the total suspended solids. No logging operation should be allowed to contribute to further degradation of Ryan's Creek.

Slope Stability - Some of the steepest slopes in the Daniel Boone National Forest (DBNF) lie within the proposed logging area. A slide has occurred on my property within the past decade or so, with no outside influences such as logging or mining. The entire proposed project area lies in close proximity to both the Pine Mountain Thrust Fault and the Rockcastle River Fault system. For these reasons, intensive stability analyses including seismic influences should be run on the areas proposed for logging. In the document, Jellico Vegetation Management Plan Project Soil Effects Analysis, prepared by Dr. Claudia Cotton (4/4/2024), Dr. Cotton mentions reported slide areas that were not confirmed. I am confused as to whether this means someone visited the site and didn't find a slide or if nobody visited the site. Anyone is welcome to visit my slide. Also, in the aforementioned report, I did not see where any consideration was given to the long-term effects on slope stability as a result of the degradation of stumps and root systems. I feel that this is an oversight and should be considered. I disagree with the author's belief (as I understand it) that heavy equipment is the main concern for the cause of slides.

Herbicides - The main concern I have with the proposed herbicides is that we have NO CLUE what those herbicides are. The runoff associated with herbicides will impact streams and soils below proposed logging areas. Livestock, crops, and bees, just to mention a few local industries could be adversely impacted by use of herbicides.

Threatened/Endangered Species - Within the proposed project area in McCreary and Whitley counties, a great many threatened and/or endangered species can be found. The mountains, valleys, and streams provide a rich diversity of species found on state endangered/threatened lists for this purpose of identifying areas in which preventative measures must be taken to ensure protection of these species. Mammals, plants, fish, and mussels listed include, but may not be limited to the following: Blackside Dace (fish) Palezone Shiner (fish) Cumberland Darter (fish) Cumberland Arrow Darter (fish) Indiana Bat (mammal) Cumberland Bean (mussel) Cumberland Elktoe (mussel) More detailed studies

regarding increased sediment loads and the effect of herbicides dissimilated into soils should be considered before any logging should be done on the proposed project area. Overall Forestry Stewardship - To engage in a logging project of this magnitude without consideration of creating something of value for residents and visitors to the region at the end of the project is a great oversight. It is duly noted that plans such as this were beyond the scope of this proposed project, but should they be? If you plan to replace culverts, improve roads and stream crossings, and make other repairs, would it take much more effort to create a few campsites or mountain bike trails? Moreover, leaving revegetation to naturally occurring species invites a takeover of invasive species, such as autumn olive trees and trees of heaven. I seriously doubt that these nuisance plants can be controlled by the proposed methods in the EA[hellip]the unnamed herbicides[hellip]Again, I appreciate the willingness of representatives of the USFS to meet with us, communicate with us, and be cordial to us during this process. I do not love Alternative 1, but it appears to be a lot more palatable than the Proposed Action. Thank you for the opportunity to comment on the draft. Deborah B. Moses, PE, PLS