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Organization: Standing Trees
Title: Board Chair
Comments: April 24, 2024

Tim Reed?

US Forest Service

?District Ranger

3320 Hwy 27 North

Whitley City, KY 42653

Re: Jellico Vegetative Management Project 63037

Dear District Ranger Reed,

Thank you for providing the opportunity to submit these comments for the Draft Jellico Vegetation Management Project Environmental Assessment (Draft JVMP EA). These Comments are submitted on behalf of all of the Standing Trees Members and Supporters who have visited and recreated in the Daniel Boone National Forest (DBNF). I grew up in Kentucky and my family and I have spent many days and nights recreating and enjoying the DBNF. The DBNF provides opportunities to enjoy solitude, visit areas with older tree stands, which are rare in the eastern United States, enjoy unspoiled clean headwater streams, and experience wildlife.

There is sufficient peer reviewed literature available to the US Forest Service (USFS) concerning the biological and climate crisis that we find ourselves in. I would hope that the USFS recognizes that we are in fact in a crisis and that we need to take appropriate rapid actions. However, projects such as the JVMP are out of step with current science concerning forest management. Forests under the management of the USFS act to absorb a significant amount of the excess carbon in our atmosphere, provide clean water, and provide protection from extreme weather events. Based on the scale of the JVMP and the environmental impact, a full Environmental Impact Statement should be performed before issuing the final Decision Notice.

The JVMP is based on a Land and Resource Management Plan (LRMP) that is well beyond it's expected life of 10-15 years as required by the National Forest Management Act. And as such, it contains information and data that is out of date. Using out of date information and data leads to incorrect decisions that have long-range and

long-term impact on the climate, the environment and society. The Draft JVMP EA is not based on "the best available science" as stated in the National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change interim guidance that is currently in effect. (Section VI., D. Using Available Information).

The JVMP is not in compliance with Executive Order 14072. This Executive Order recognizes the importance of forests on Federal lands to provide clean air and water and their essential role in combating the biodiversity and climate change crisis that we face. The Executive Order committed to "[hellip] managing forests on Federal lands, which include mature and old-growth forests, to promote health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate reliance; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable economic development." (Executive Order 14072, Sec. 2) A significant amount of the proposed logging for the JVMP is in areas that contain trees greater than 80 years old. These areas provide the greatest amount of opportunity for biological study, the greatest amount of biodiversity, the greatest amount of stored carbon, the highest levels of carbon storage uptake, the greatest benefits for clean water, and the highest resilience to climate change and extreme weather events. In fact, the JVMP is designed to reduce the age of the DBNF based on the outdated DBNF LRMP which was written before the issuance of Executive Order 14072 and is not based on "the best available science". Given the size and significance of the JVMP, the USFS must perform a detailed Environmental Impact Statement, not an Environmental Assessment. The Draft JVMP EA does not offer any alternatives that follow the directions of Executive Order 14072 and they do not protect areas that contain trees 80+ years old.?

The Draft JVMP EA does not comply with requirements of the Council on Environmental Quality "National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change". Sections IV and V of the National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change interim guidance provide clear guidance for disclosing and considering the reasonably foreseeable effects of proposed actions including the extent to which a proposed action and its reasonable alternatives (including the no action alternative) would result in reasonably foreseeable GHG emissions that contribute to climate change and the importance of considering mitigation actions, climate resilience and adaptation. These sections are:

* IV. A. Quantifying a Proposed Action's GHG Emissions - In the past, the USFS has made statements that emissions from a proposed action or its alternatives represent only a small fraction of global or domestic emissions. This evades the fact that any and all of the actions have a cumulative impact on GHG emissions. The Draft JVMP EA does quantified and or make available to the public, the direct and indirect GHG emissions, by pollutant and by total CO2 equivalent, the carbon released from plants and soils during logging, the GHG emissions from the logging equipment, the GHG emissions from the transportation of the logs to the point of manufacturing, the GHG emissions resulting from the manufacturing and distribution of the end products, and the GHG emissions released from any burning of the logging products such as biomass. In addition the amount of stored carbon released from the logging activities plus the loss of the future carbon storage of the trees logged were not compared to the amount of carbon that will be stored by the regrowth and the carbon deficit, in GHG equivalent amounts and time.

* IV. B. Disclosing and Providing Context for a Proposed Action's GHG Emissions and Climate

Effects - The Draft JVMP EA does not disclose the social cost of GHG (SC-GHG) by individual

type of GHG and does not disclose the real world effects of increased GHG's on the local

population as required in this section. Due to the fact that logs from these logging activities

will be transported and used well beyond the logging locations, this analysis must included

the population that will be impacted by the release of GHGs from the processing and

manufacturing of wood products as well as any and all burning of biomass.

* IV. D. Baseline for Considering Environmental Effects - The Draft JVMP EA is not based on

current carbon assessments and current conditions of the DBNF. The data in the DBNF LRMP is outdated and inadequate. Given the urgency of accurately addressing the biological and climate crisis and assessing the impact of a project the size of the JVMP, it requires that the USFS utilize more recent and current data and science that is available to them.

* IV. E. Direct and Indirect Effects - The Draft JVMP EA does not adequately analyze "direct" and

"indirect" effects of the proposed logging actions. These direct and indirect effects should

include the GHG emissions related to the logging activities, the GHG emissions related to

the transportation of the logs for processing, the GHG emissions related to the processing

of the logs into wood products or biomass, the GHG emissions related to burning of any

biomass.

* IV. F. Cumulative Effects - The Cumulative Effects analysis in the Draft JVMP EA is woefully inadequate. It does not include emissions from all other approved DBNF logging plans and does not provide the public with a clear understanding of this action and other DBNF actions. The cumulative effects analysis must include the direct and indirect GHG emissions, by pollutant and by total CO2 equivalent, the carbon released from plants and soils during logging, the GHG emissions from the logging equipment, the GHG emissions from the transportation of the logs to the point of manufacturing, the GHG emissions resulting from the manufacturing and distribution of the end products, and the GHG emissions and other particulates released from any burning of the logging products such as biomass. In addition the amount of stored carbon released from the logging activities plus the loss of the future carbon storage of the trees logged must be compared to the amount of carbon that will be stored by the regrowth and the carbon deficit, in GHG equivalent amounts and time.

* IV. G. Short- and Long-Term Effects - The lifetime for logging activities like those proposed

for the JVMP go well beyond the end of the logging activities. For example, the expected lifetime of a tree should be taken into consideration when analyzing the additional carbon uptake that would occur if the tree was not cut. This is to be compared to the amount of carbon uptake that occurs from the trees that replace those that were cut and the amount of time it will take to replace the carbon sequestration that was lost from the tree that was cut. The analysis will differ by stand age. This was not completed and is not available for the public for the the Draft JVMP EA.

* IV. H. Mitigation - The Draft JVMP EA does not include mitigating measures that will be undertaken by the USFS to avoid GHG emissions, impacts to water quality, impacts to any and all plants and wildlife, and avoid impacts to solitude and backcountry experiences.

* IV. I. Special Considerations for Biological GHG Sources and Sinks - Logging activities have

multiple and significant impacts on carbon storage and GHG emissions. The impacts are

both immediate and long term. The Draft JVMP EA does not provide the public with sufficient analysis of these impacts and does not include assessments of the carbon and GHG impacts from the logging activity - all plant life, soil disturbance and water impacts, loss of additional carbon uptake from trees that have been logged, amount of time required to replace the stored carbon and the additional carbon that was being accumulated, GHG emissions from the logging

activities, transportation of the logs, manufacturing of wood products, and biogenic impacts of any biomass resulting from the logs extracted from this project.

* V. A. Affected Environment - The Draft JVMP EA does not provide the public with the impacts to the affected environment that goes well beyond the project boundaries. The loss and release of stored carbon, the loss of future stored carbon, and the GHG emissions released during the

logging, transportation, manufacturing and burning of any biomass, as well as impacts to

headwater streams which feed important watersheds have regional and national impacts.

* V. B. Effects - The Draft JVMP EA does not identify how the logging activities will impact human communities, especially any communities that will be disproportionally impacted. Impacted communities go well beyond the project boundaries. Loss of carbon storage and

sequestration, GHG emissions from the project, impacts to headwaters that feed

watersheds, and GHG and particulate emissions from burning of any wood products from

this project are regional in nature at the least.

* V. C. Using Available Assessments and Scenarios To Assess Present and Future Impacts - The

USFS continues to use the outdated DBNF LRMP to guide projects such as the JVMP. The DBNF LRMP and Amendments are out dated and do not recognize current science related to areas such as forest health, carbon storage and sequestration, water quality, and the importance of older and mature forests, to name a few. The USFS should consider as an alternative to halt the JVMP until the DBNF LRMP is amended and to allow for more recent forest health and carbon assessments of the DBNF.

* V. D. Resilience and Adaptation - Information in the DBNF LRMP related to increasing

sea level, water quality, drought, high intensity precipitation events, increased fire risk, or

ecological change, climate resilience and adaption, as well as identification and recognition

of impacted communities is out of date. The USFS should consider as an alternative to halt the JVMP until the DBNF LRMP is amended and to allow for more recent forest health and carbon assessments of the DBNF.

For these and many other reasons, the Draft JVMP EA is not in compliance and the USFS must complete a thorough Environmental Impact Statement for the JVMP.

Thank you for allowing me to submit the comments.

Respectfully,

Mark Nelson

Standing Trees Board Chair