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Comments: An Order 1 Soil Survey would make performing a RUSLE2 calculation possible, but not without it. Soils change frequently, within 100 feet, in the Appalachian Mountains, with slopes over 35 % steep.

This means, that every soil location greater than 35% slope cannot be used in the RUSLE calculation - the calculation falls apart and does not reflect real life soil behavior.

Soils in a continuous linear path may have but a short length of landscape that could be less than 35% slope and that length, slope, soil characteristics, climate all go into the calculation. But you see, large sections of the landscapes are removed from the total value, because we cannot accurately predict soil behavior over 35% slope.

RUSLE was designed for less than 9% slope.

RUSLE has a limit of area of 285 acres of uniform soils. Again, there are not uniform soils in a linear path through steep mountains. You see, no one has the data to do the math.

Please deny mvp entry to JNF on the basis of extensively soil erosion to date and mvp lack of ability to control erosion degrading the upper slopes of Siniking Creek Mountain.