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Public Comment: Red River Gorge Management Planning- Comprehensive River Management Plan

To Mr. Kazmierski:

Kentucky Heartwood and the Kentucky Resources Council are providing comments concerning the scoping and draft Environmental Assessment and the Finding of No Significant Impact for the Red River Gorge Geological Area that is available on the Red River Gorge Management Plan project page. We have included our recommendations to ensure the plan fits the law, science, and Forest Plan for the Daniel Boone National Forest.

Kentucky Heartwood (KHW) was founded in 1992 with a mission to protect and restore the integrity, stability, and beauty of Kentucky's native forests and biotic communities through research,

education, advocacy, and community engagement. We present ~800 members living in Kentucky and across the United States.

The Kentucky Resources Council, is a membership-based nonprofit organization founded in 1984 with a mission to protect our built and natural communities from pollution and environmental damage.

#### Compliance with National Environmental Policy Act

It's a bit confusing that the Forest Service put out the scoping letter along with the draft Environmental Assessment and the Finding of No Significant Impact at the same time. Will there be another public comment opportunity for the public to comment on the draft EA and FONSI or will this process go straight to an objection process?

#### Adaptive Management

Please see our issues with adaptive management in our comments regarding the Red River Gorge Management Planning comments. Decisions about development (amenities, boat ramps, structures in floodplains, etc.), user capacity, water quality, threatened and/or endangered species require consultation and/or concurrence letters from all other federal agencies cannot and should not be pushed off to a post-decisional process. Consultation and/or concurrence letters should inform all of your decisions and be provided to the public for review in the public reading room. Please provide this information before signing an EA and FONSI.

#### Vicinity and Proposed Boundary Map

Kentucky Heartwood will state again for the record, that while the Forest Service provides a proposed boundary map for the changes to the boundary of the Red Wild and Scenic River, the Forest Service does not provide a comparable quality map that shows where the Forest Service is

proposing to drop 86 acres from the boundary. Even a map that shows shaded parts where acreage will be dropped will help the public submit substantive comments regarding this administrative change.

## Recreation

From the draft CRMP page 8:

[ldquo]The towering sandstone cliff lines that buttress the wild segment of the Red River are known as some of the world[rsquo]s premier rock climbing areas, attracting rock climbers from across the globe.[rdquo]

Please provide which areas of the wild section of the Red River the Forest Service is referencing here. The wild segment of the Red River passes along sections that run along private property and the Clifty Wilderness. The statement implies that there may be sport climbing routes in Wilderness, but it is unclear. If bolts and anchors are in Wilderness, and if they were placed after the signing of the 2004 Forest Plan then these are illegal routes (unless approved) and should be removed with non-mechanized tools to comply with the Forest Plan and the Wilderness Act. If they are in the wild section that is outside of Wilderness then these may be legal routes. Please clarify. I know this may not be a river issue, but it is a part of the overall plan for the RRG.

Per the DBNF Forest Plan:

2.A-REC-5. No new rock climbing routes with fixed anchors are allowed. However, maintenance or replacement of existing approved fixed anchors is allowed by non-mechanized means.

## Fisheries

From the Fisheries section of the CRMP pg. 9:

Two ESA listed fish species can be found within the Red River planning area: the Kentucky arrow darter and the snuffbox mussel.

Please provide consultation letters and/or concurrence letters for any development and/or

increased user capacity that may impact Kentucky arrow darter and snuffbox mussel. Kentucky

arrow darter is listed as [lsquo]threatened[rsquo]<sup>1</sup> and the snuffbox mussel<sup>2</sup> is listed as [lsquo]endangered[rsquo] per the

United States Fish and Wildlife Service. It is unclear where the species may be present in the project

area from the information provided, though it seems the Kentucky arrow darter is present in Rock

Bridge Fork (a tributary of Swift Camp Creek) and the snuffbox mussel, which does not have critical

habitat, is found in the Red River. While these species exist in other parts of the Daniel Boone

National Forest, proposed logging could impact those species as well such as populations in Clay

<sup>2</sup> Snuffbox mussel. USFWS. Accessed:

<https://www.fws.gov/midwest/endangered/clams/snuffbox/snuffboxfactsheet.html>

<sup>1</sup> Kentucky arrow darter. USFWS. Accessed: <https://www.fws.gov/southeast/wildlife/fishes/kentucky-arrow-darter/>

and Leslie Counties as part of the South Redbird [ldquo]Wildlife Enhancement[rdquo] project. Sacrificing some

because some of the population exists in another area is not enough to ensure population viability.

## History and Archeology

From CRMP, page 10:

The wild and scenic river area and the surrounding Red River Gorge area has been occupied

for over 10,000 years, often by multiple cultural groups and for sacred purposes. At least 20

sites within the corridor are contributing elements to the National Register of Historic

Places, and the corridor is only 17.8 percent surveyed.

It may be literally impossible to survey 100% of the Red River Gorge for historical and archeological sites. However, consultation with Sovereign Nations must be adequately completed so tribes may speak for sacred and cultural sites.

#### Visitor Capacity

If the Forest Service is going to implement shuttle services and increase parking (let's just assume the agency puts in the maximum amount of parking spaces and increases commercial permits), the Forest Service must consider how these two plans could bring more people into the Gorge than the visitor capacity suggests causing more damage and a real overcrowding problem. The visitor capacity estimates that 4,300 day use visitors could be in the Gorge area at one time. The Forest Service should not build out with maximum capacity in mind. The Forest Service may need to go back and do a LAC per the Forest Plan in the next 5 to 10 years if the visitor capacity continues to impact the ecological character of the Red River Gorge.

#### Minimum Requirements Analysis

Additionally, up to 10 front-country and 10 backcountry designated campsites are proposed along the recreational segment, as well as up to 15 backcountry designated campsites along the wild segment of the river within the Clifty Wilderness, depending on results from a Minimum Requirements Analysis (MRA).

The Minimum Requirements Analysis is basically the crux of the Forest Service's justification for violating the Wilderness Act and trammeling Wilderness in order to prevent more trampling. But from the statement above, it appears that the Minimum Requirements Analysis has not been completed. This must be completed before an EA and FONSI is signed or the Forest Service is treading on legally shaky ground. Please provide the MRA analysis on the project website for public review. The agency has not considered less constrictive measures that may be equally protective

before seeking permission to change the wilderness character of Clifty Wilderness for a very long time if permanently. Hire more wilderness rangers, river rangers, climbing rangers; whatever enforcing presence you need.

## Conclusion

So much of this overall plan for the Red River and the Red River Gorge is based upon a quasi-adaptive management framework and it leaves so much to be questioned. Some may be willing to roll with this wide-open management style, but they may be surprised when the Forest Service starts making decisions without their consent. That is the danger in how adaptive management is being used here. Yes, the agency has built in some triggers and thresholds, but it is largely still an undefined plan that needs to fit within certain federal laws and requires robust consultation with other federal agencies before an EA and FONSI is signed. We appreciate the agency taking our comments into consideration. It comes from a place of advocating to give the public the full scope of the plan.

Sincerely,

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