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Comments: Attached please find comments on behalf of the Kentucky Sierra Club pertaining to the Red River Gorge Management Planning Project Preliminary Environmental Analysis, Finding of No Significant Impact, and Comprehensive River Management Plan for the Red Wild and Scenic River.

July 26, 2021

Jonathan P. Kazmierski Cumberland District Ranger Daniel Boone National Forest 2375 KY 801 South

Morehead, KY 40351

Public Comment: Red River Gorge Management Planning [ndash] Draft EA and FONSI

Dear Mr. Kazmierski:

The Kentucky Sierra Club appreciates the opportunity to submit comments in regards to the draft Environmental Assessment and the Finding of No Significant Impact for the Red River Gorge Geological Area.

The Kentucky (formerly Cumberland) Chapter of the Sierra Club has been active in matters regarding protection of the Red River Gorge and its core values since our inception in 1967. In 1993, the Red River was permanently protected as Kentucky's only federal Wild and Scenic River, a designation that the Sierra Club had long promoted and supported. We are pleased that the Forest Service is proposing a river management plan to protect and enhance these values, including free flow, water quality, and uniqueness. Our interest in the Red River will always be for protection of its quality and values.

#### General Comments regarding the Proposed Action

The Kentucky Sierra Club agrees that managing increasing levels of use of the Red River Gorge is needed in order to preserve its character and inherent values. However, we are concerned by the lack of site-specific locations and field surveys in this proposal. The Proposed EA states that "[f]ield surveys will assess current conditions and provide site-specific information prior to implementation." Deferred field surveys and "[a]daptive management" are not a substitutes for NEPA compliance. The Forest Service should complete initial surveys regarding current conditions and projections before a final decision, so that appropriate triggers and responses may be discussed and considered in the final EA. Such surveys and analysis should also be used to provide detailed information regarding the proposed locations of campsites, parking spaces, and other infrastructure that can be determined at the outset of this planning project.

Since the proposals are designed to be implemented over time with analysis of impacts helping to drive future steps, we urge active monitoring of user levels and an initial approach to issues such as parking that will be the most protective of the ecological values and unique character of the Red River Gorge. Finally, please ensure that all monitoring activities and actions taking place during adaptive management phases are made available to the public, so that interested parties may participate in the management process and offer input.

#### Water Quality and River Access Issues

We support continuation of efforts, both educational and financial, to remedy the water quality issues in Swift Camp Creek. Working with local government and private landowners to effect proper sewage disposal builds a healthy relationship to find solutions that benefit both the quality of water in the Red River and improving the health and well-being of those citizens that border the Gorge. Likewise, planning for environmentally sound river access for recreational users will be a large step forward in eliminating impacts caused by this use.

By providing boat launches and river access points, users will be able to enjoy the river and its values without having a large negative impact on the river corridor. Creation of user access points and boat launches for the recreational section of the Red River also appears to be the best strategy for reducing erosion and siltation in the river.

#### Clifty Wilderness / Designated Campsites

The Kentucky Sierra Club is concerned about the lack of detail pertaining to the location of proposed campsites and impacts to primitive areas in the Red River Gorge. More effort and public input is needed regarding the designated campsite proposal, especially in implementing user acceptance and use of these sites. Please disclose the location of the 200 campsites and 10 group campsites proposed for the backcountry, and allow for public input as to these proposals.

We are also concerned that designation of campsites in the Clifty Wilderness System may degrade its wilderness values and violate the Wilderness Act. We support Kentucky Heartwood's proposals regarding other alternatives that should first be considered before resorting to a designated campsite system. Alternatives such as a free permit system and a bigger presence of Wilderness Rangers may alleviate the need to establish designated campsites in the Clifty Wilderness.

We also support Kentucky Heartwood's suggestion that the Forest Service consider creating and adopting a Climbing Management Plan, just as they are creating a Comprehensive River Management Plan. We support the banning of new bolts and fixed anchors in the Clifty Wilderness.

#### Environmental Justice

We note the comment in the Environmental Justice impact section that "New fees are not proposed as part of this decision. The current fee structure will remain in place and may be modified over time in accordance with the Recreation Enhancement Act." We oppose any permitting or reservation system that would create additional administrative fees and/or complexities that may discourage minority and low-income populations from utilizing resources in the Red River Gorge. These populations are already under-represented in national lands activities and great care needs to be used in protecting their rights to access.

#### Public Participation

The Red River Gorge Management Planning proposals set forth in the Draft EA-FONSI will draw significant public attention when implementation begins. Many public comments have already been submitted that address the complexities of increasing some recreational infrastructure (if you build it, they will come) vs. decreasing some trails and campsites (limiting personal freedoms on public land). For these reasons, specific project details should be made available to the public as they become available, with additional opportunity for public input and comment. A periodic e-newsletter, a dedicated webpage, etc. could be used to keep the public informed of the projects as they are developed and implemented.

#### Conclusion

These are some of the concerns and issues that we will be seeking to follow and understand as the Red River Management Plan and proposals set forth in the EA move forward. Thank you for this opportunity to comment and we look forward to continued engagement with the Forest Service on its efforts to restore and protect the Red River Gorge.

Sincerely,

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