12/05/2019

Robert Claybrook, Redbird District Ranger  
91 Peabody Road  
Big Creek, Kentucky 40914

Ranger Claybrook,

Please accept these comments on your proposed “South Red Bird Wildlife Enhancement Project” prepared on behalf of Heartwood, Inc. Heartwood is a non-profit network of over 100 member groups across the eastern U.S., including many who frequently visit the Daniel Boone National Forest, some of us for five or more decades. We take a deep interest in the health and vitality of that forest ecosystem.

First, the sheer size of the proposed project, in comparison with other recent project areas in your District, is beyond what can feasibly be planned for and managed responsibly through such a meager project prescription. Any area of forest of that magnitude will include diversity of both terrain, soil types, water shed composition, species (flora and fauna), forest structure, etc. that cannot be properly addressed in a streamlined management prescription. At the very least, this project should be broken up into manageable pieces that can be responsibly reflected in a legitimate impact assessment, including detailed alternatives and proven mitigation measures.

Second, the mere suggestion of building up to 91 miles of skid trails and 150 log landings should be enough to indicate that this project is unacceptable. This sounds more akin to a subdivision project! In a time when the Forest Service is pushing for road, and even trail, closures, proposing this scale of construction is simply unacceptable. Given that many of the streams in the project area are acknowledged as Critical Habitat for federally listed fish and mussel species, construction of ANY skid roads or landings should be given the most careful consideration for impacts. Given the track record of projects in your District, this cannot be assumed to be the case.

Previous projects in the Redbird District have been undertaken in similar terrain, soil and forest types and have resulted in extensive erosion. These projects have also allowed entrance to invasive species, and did NOT begin to produce the desired outcomes of the project prescriptions. It should thus be obvious that your plan and the proposed mitigation measures have resulted in failure to achieve your stated goals in the recent past. Failure cannot be corrected by doing the same thing, only on a much larger scale.

Whoever was in charge of undertaking the previous projects and mitigation measures clearly did not do an adequate job. Whoever allowed the same type of plan and inadequate mitigations to be enlarged to this extent was obviously not monitoring previous results. This forest belongs to the public and it is your responsibility as a public employee to ensure that it is managed for the public’s good, including not destroying recreational, potential old growth, and interior habitat values associated with sections of the South Red Bird project area.

There are alternatives for creating seral habitat within your District by continuing to manage areas that were logged in the recent decades. Non-commercial thinning is such an option that would do far less damage and not require the blatant destruction of an area that is very desirable for public access, wildlife habitat, recreational and aesthetic values, etc. That these alternatives were not fully developed as part of this project proposal should be enough to disqualify it. Kentucky Heartwood has provided you with extensive documentation regarding conditions, impacts from previous projects in the area, and viable alternatives. We wish to reference the comments of Kentucky Heartwood into our comments and request that the South Red Bird Wildlife Enhancement Project be withdrawn from consideration and alternatives for achieving your stated management goals be developed.

Every effort will be made to fully document existing conditions in the project area, and continued monitoring of the area will be undertaken long after the work is done to document the impacts. Continuation of prescriptions and practices that have failed to produce the desired outcomes is simply not acceptable.

Sincerely,

David Nickell

Heartwood Council Chair

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