

Data Submitted (UTC 11): 7/23/2021 4:00:00 AM

First name: Dave

Last name: Stawicki

Organization:

Title:

Comments: Comments re: EA-FONSI for Red River Gorge Management Actions

Submitted by Dave Stawicki (entered into CARA by Andrea Felton, DBNF Environmental Coordinator 7/23/2021)

The proposed management actions described in the EA-FONSI appear to signify a shift in DBNF management philosophy as it pertains to the red River Gorge. That is, the dispersed recreation model will, over time, be replaced by a directed/concentrated use model in order to manage and mitigate user impacts while protecting larger areas of the Gorge. Given the increasing use of this area due to its scenic and natural values, this shift seems to be inevitable.

There are two over-arching issues that I see in the plan:

1. The dichotomy of enhancing certain recreation infrastructure issues - parking, shuttle stop, picnic areas, restrooms, etc. - versus the "decommissioning" of other user-defined activities - campsites, trails. I'm sure this will present the Daniel Boone National Forest (DBNF) staff with outcry and objection as the plan is implemented.

- 2.

The fact that the proposal relies on future studies and data for decision making and currently establishes direction with little specificity on details that can be analyzed and commented upon. I fear this may create a public backlash as projects are implemented over time.

Nevertheless, here are some areas of the proposed actions I do have comments on.

Designated Campsites: The profligation of dispersed campsites, whether legally or illegally sited, is one of the most pressing problems facing the Red River Gorge. Though a bit restrictive, it does provide a destination for users and concentrates use for management while protecting surrounding resources. The concept of designated campsites, front- or back country, is in use in National Parks, some National Forests and other areas of high use.

The issue that arises is, after designating campsites, how is the appropriate use implemented and enforced? Do we rely on an honor system for users to comply? Or will there be a permit system? If permits are required, then How? Where? When? From Who? would they be gotten. This would assume a locally administered permit system that would not involve additional fees. Some reference has been made to using a reservation system, like recreation.gov, which, for me, poses the additional issue of the fee charged by recreation.gov just for using its system.

Any additional fees, for campsite use or in the form of service fees, with further disenfranchisement of minority and low-income populations. The FONSI states "Project activities are anticipated to have beneficial effects to the local economy including potential to

provide economic opportunities for minority and low-income populations.", but does not address the impact on these same populations of users. This will require some additional planning to implement to meet the goals of Environmental Justice initiatives.

A further concern I have about reservations has to do with my experience with their real world application. Many times I have been at campgrounds or backcountry permitted sites where I was provided a reservation and permit, then found that other parties, who also had reservations, did not show up to use the permit. A reservation system can, potentially, lock up campsites then go unused, denying access to others who would have used the site. This happens more than one would want to acknowledge. If campsites are to be designated and permitted, then more thought - and discussion - on implementation of this strategy needs to occur.

Campfires: Due to the widespread damage that can occur due to improperly attended open campfires, limiting such fires to DBNF designated fire rings and grills is a reasonable strategy. Plus, the ability of the Forest Supervisor to prohibit all fires during times of high fire alert would limit impacts of unrestrained fire events in the RRG.

Transportation and Parking: I am concerned about the potential option to harden the surface of some roads like Tunnel Ridge, Chimney Top, Rock Bridge, etc. with asphalt or pavement as I feel this "improvement" actual decreases safety on these roads. Since these decisions are to be made in light of future study and analysis, I would request that the projects, when proposed, be placed before the public for comment. I realize that the DBNF is not currently saying this is a proposed action, and I would not be comfortable proposing a blanket objection at this time to the possibility. However, this is a big change and impact on the RRG and should be deliberated thoroughly, with the specific plans made available for review of any such project.

Boat Launches/River Access Points: At this time, Copperas Creek Boat launch is the only official access/launch point on the recreational segment of the Red River, thus all river access in this segment is user built with potential environmental impacts to water quality. So, I am fully in favor of increasing these points for environmentally sound use. I would recommend that the jump Rock access point and Edmunds Branch boat launch be prioritized to provide user access to as much of the designated river sections as possible.

Communication: Because of the 'adaptive' and long-term implementation nature of many of these proposals, I feel it is important that the DBNF keep us, the users, informed on a continuing basis throughout the process. Knowing the specifics of each project and what adaptations are being made will help us better understand the process and anticipate the future impacts to our use. I would suggest dedicating a page of the DBNF website to "RRG management updates" which would include the status of any active project, its specific details, its location;

this could also be a place to call for volunteers or post scoping notices if a particular project calls for that.

The EA-FONSI establishes a framework of actions that can be utilized to help protect and preserve the Red River Gorge while still providing recreational opportunities for users. However, without specific actions to review, it is hard to provide specific suggestions for changes. A continuing dialogue between DBNF staff and the Gorge users needs to be fostered so all parties can come away satisfied.