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Public Comment: Red River Gorge Management Planning-Administrative Change

To Mr. Kazmierski:

Kentucky Heartwood and the Kentucky Resources Council are providing comments concerning the proposed administrative changes to the Forest Plan that outlines the management directives of the Daniel Boone National Forest.

We understand that there is no requirement for Forest Service officials to respond to public comments concerning administrative changes to the Forest Plan nor is there an objection period.

This makes it imperative that the Forest Service provide adequate information so the public can provide substantive comments concerning proposed mapping changes and correcting typographical errors that may impact the characteristics and management of the Red Wild and Scenic River and the Red River Gorge.

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.

Administrative Change #1: Correct the boundary for the Red Wild and Scenic River

The information and maps the Forest Service provided concerning the boundary changes of the Red Wild and Scenic River are inadequate for the public to make substantive comments. It is unclear where the agency plans to drop 86 acres from the boundary of the Red Wild and Scenic River. A lack of information also does not clarify any discrepancies, which is the stated intent of this change.

The letter references this map found in the 2004 Forest Plan as the current boundary for the Red Wild and Scenic River:

[See original pdf for maps]

While the map above may be an accurate depiction of the current boundary of the Red River, it is impossible to compare this map to the proposed boundary map seen here:

The Forest Service should use their current information and understanding of the boundary to create a high quality map of the current boundary of the Red Wild and Scenic River that is comparable to the quality of the proposed map. It's a better way to help citizens understand where potential acreage may be eliminated from the Red Wild and Scenic River..

The Wild and Scenic Rivers Act ("the Act") is federal legislation designed to safeguard the character of our nation's unique rivers. The Act sets aside certain rivers that possess outstanding scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, to be preserved in free-flowing condition, and protects immediate environments for the benefit and enjoyment of present and future generations.¹

While the language in the Act states the boundary of the wild section of the Red River should match the boundary of the Commonwealth of Kentucky's Kentucky Wild River designation², the Act also

2 US Congress. 1993. H.R.914 [ndash] Red River Designation Act of 1993. Accessed at:

<https://www.congress.gov/bill/103rd-congress/house-bill/914/text> USDA Forest Service. 2004

1 Wild and Scenic Rivers Act. 1968. <https://www.rivers.gov/documents/wsr-act.pdf>

states that the immediate environments surrounding wild and scenic rivers should be protected

based upon more specific designations within the Act (ie wild, scenic or recreational designations).

No development should be seen from the wild section of the Red River. Some development may be viewable from the shoreline of the recreational section of the river.

Admittedly, it is hard to speculate where anyone will develop on private property, but if acreage is dropped along the boundary of the wild section of the Red River, will there be enough land buffer to keep landowners from developing and compromising the viewshed along the wild section of the Red River? Did the surveyor take this into account and document the potential issues?

Also, the document states [ldquo]a small sliver of land was undefined between the Clifty Wilderness boundary and a section of the Red Wild and Scenic River recreational boundary shown in the forest plan.[rdquo] It[rsquo]s hard to tell where this change will occur from the information provided. Will this land be added into the Wilderness designation? How will it be classified? It[rsquo]s hard to tell how small of a discrepancy this is based upon the information provided.

The public overwhelmingly loves the Red River, and many are still tied to the very fight to keep the Red River from being dammed. Please provide adequate information so citizens can make substantive comments. They may support your changes; maybe not. It[rsquo]s up to the Forest Service to provide enough information to give citizens a chance to make substantive comments.

Administrative Change #2: Correct the Scenic Integrity Objective within the Red River Gorge

Geological Area

The Forest Service proposes to reclassify the Scenic Integrity Objective (SIO) of the recreational section of the Red River and the Red River Gorge Geological Area, outside of the Clifty Wilderness and wild section of the Red River. They proposed to reclassify both areas from [ldquo]Very High[rdquo] to [ldquo]High[rdquo]

on the SIO spectrum because of a typographical error.

It's well known that an influx of visitors and users to the Red River Gorge and a lack of personnel and law enforcement has caused the ecological decline of the Red River Gorge, the Red River, and the Clifty Wilderness. That is largely what precipitated the need to revisit the Limits of Acceptable Change and actually establish a Comprehensive River Management Plan (among other factors outside of the Forest Service's jurisdiction). The pictures and descriptions in the draft Red River Gorge Management Plan proves this.

According to Landscape Aesthetics: A Handbook for Scenery Management, assigning SIOs to prescription areas requires an ecosystem inventory and analysis and that also requires looking at the physical, biological and social characteristics in relation to the aesthetics of an area³.

In order to decipher whether this is truly a typographical error or rather a result of the Forest Service abdicating its responsibility to manage the Red River Gorge, the Forest Services should provide documentation of how the SIO was determined in the 2004 Forest Plan for the Red River and the Red River Gorge. That should include documentation of the inventory, analysis and planning, implementation, and monitoring plan. It's pretty clear from the photos in the project documents of the Red River Gorge Management Plan that the Red River Gorge and the Red River are indeed ecologically and visually declining. However, should that be grounds for a permanent change

3 Landscape Aesthetics: A Handbook for Scenery Management. Agricultural Handbook Number 701.

USDA. Forest Service. 1995.

to the management of those areas or rather a reason to do better and raise the SIO of certain prescription areas?

If this is not a typographical error, but rather an existing landscape condition, the Forest Service needs to remedy the issue and bring it up to the original SIO characteristics instead of lowering the SIO because of poor management or allowing for more development that may lead to lower SIOs in the future.

Changing the Forest Plan has management ramifications, and in this instance, it's important for citizens to know the baseline condition from the 2004 Forest Plan to understand the proposed changes now.

The bottom line is the Red River Gorge Geological Area and the Red Wild and Scenic River were given special designations because they exhibit characteristics that are found nowhere else in the United States. We need to know how the Forest Service's proposed administrative changes will further impact a well-loved area that is, frankly, taking a beating from our undying affection.

Citizens may be appreciative if the Forest Service would provide more information before unilaterally signing off on administrative changes to the Forest Plan. It would be commendable, helpful, and necessary.

Sincerely,

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cc: Scott Ray, Forest Supervisor, Daniel Boone National Forest