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Comments: The Kentucky Sierra Club and Kentucky Heartwood provide the following comments concerning the proposed administrative changes to the Forest Plan that outlines the management directives of the Daniel Boone National Forest.

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] Administrative Changes

Dear Mr. Kazmierski:

The Kentucky Sierra Club and Kentucky Heartwood provide the following comments concerning the proposed administrative changes to the Forest Plan that outlines the management directives of the Daniel Boone National Forest.

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[rsquo]s only federal Wild and Scenic River, a designation that the Sierra Club had long promoted and supported. The Kentucky Sierra Club has 6,000 members and supporters in Kentucky, working together to protect our communities and wild places, including the Red River Gorge.

Kentucky Heartwood was founded in 1992 with a mission to protect and restore the integrity, stability, and beauty of Kentucky[rsquo]s native forests and biotic communities through research, education, advocacy, and community engagement. Kentucky Heartwood submitted more thorough comments on these administrative changes on July 22, but also signs on to these comments to address the issue of whether these are administrative changes to the Forest Plan, or rather plan amendments or revisions, for which the amendment requirements of 36 C.F.R. [sect] 219.13(b) apply.

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

The Kentucky Sierra Club supports the use of modern technology to create a precise digital boundary for the Red Wild and Scenic River. However, it is unclear where the agency plans to drop 86 acres from the wild segment of the river corridor, or precisely where the boundary may change. What ecological, recreation, or other impacts may occur as a result of these boundary changes? The information and maps the Forest Service provided concerning the boundary changes are inadequate for the public to make substantive comments. Please provide complete information and an additional opportunity for public comment.

Administrative Change #2: Correct the Scenic Integrity Objective within the Red RiverGorge Geological Area

The Forest Service proposes to reclassify the Scenic Integrity Objective (SIO) of the Red River Gorge Geological Area and the recreational section of the Red Wild and Scenic River from [ldquo]Very High[rdquo] to [ldquo]High.[rdquo] The Forest Service states that the [ldquo]Very High[rdquo] designation was a typographical error and is not consistent with the Forest Plan. However, the information provided by the Forest Service is again inadequate for the public to make substantive comments. There is no discussion of the affected acreage and impacts of this change. Does this clerical change also change the Summary of Allocations in Acres in Appendix C?

Further, we are concerned that this is not the correction of a clerical error, but is instead an improper remedy for addressing degraded ecological and visual conditions at the Gorge. In order to decipher whether this is truly a typographical error in the Forest Plan or if this is a substantive change based on more current conditions, the Forest Services should provide documentation of how the SIO was determined in the 2004 Forest Plan. This should include documentation of the inventory, analysis and planning, implementation, and monitoring plan.

Applicability of 36 C.F.R. [sect] 219.13(c)

Both the change to the boundary for the Red Wild and Scenic River and the change to the Scenic Integrity Objective within the Red River Gorge Geological Area are [ldquo]Plan Amendments[rdquo] that are subject to the required procedures set forth in 36 C.F.R. [sect] 219.13(b) and NEPA.

An [ldquo]administrative change[rdquo] is defined as [ldquo]any change to a plan that is not a plan amendment or plan revision. Administrative changes include corrections of clerical errors to any part of the plan, conformance of the plan to new statutory or regulatory requirements, or changes to other content in the plan ([sect] 219.7(f)).[rdquo] 36 C.F.R. [sect] 219.13(c). Administrative changes are not subject to the requirements of 36 C.F.R. [sect] 219.13(b).

In promulgating the National Forest System land management planning rule, the U.S. Department of Agriculture explained:

Plan components are the plan's desired conditions, objectives, standards, guidelines, suitability of areas, or goals described in [sect] 219.7. An amendment is required if a change, other than correction of a clerical error or a change needed to conform to new statutory or regulatory requirements, needs to be applied to any of these plan components.

Administrative changes are made to correct clerical errors to plan components, to alter content in the plan other than the plan components, or to achieve conformance of the plan to new statutory or regulatory requirements. A clerical error is an error of the presentation of material in the plan such as phrasing, grammar, typographic errors, or minor errors in

data or mapping that were appropriately evaluated in the development of the plan, plan revision, or plan amendment. An administrative change could not otherwise be used to change plan components or the location in the plan area where plan components apply, except to conform the plan to new statutory or regulatory requirements. Changes that could be made through an administrative change may also be made as part of a plan amendment or revision instead.

77 Fed. Reg. 21162, 21239 (April 9, 2012).

To the extent that these proposed [ldquo]typographical[rdquo] changes are used to change Forest Plan components or the location in the plan area where plan components apply, they are not [ldquo]administrative changes[rdquo] pursuant to 36 C.F.R. [sect] 219.13(c). Eliminating acreage from the Red Wild and Scenic River may change the location of where certain plan requirements apply (although more information is needed, as noted in our comments). Changing the Scenic Integrity Objective within the Red River Gorge Geological Area from Very High to High will have management ramifications that should exclude it from qualifying as a [ldquo]clerical[rdquo] amendment to the 2004 Forest Plan. Therefore, both changes are [ldquo]Plan Amendments[rdquo] that may only be done pursuant to the process set forth in 36 C.F.R. [sect] 219.13(b) and the Forest Service NEPA procedures.

Sincerely,

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