



KENTUCKY HEARTWOOD

Protecting the Beauty and Wellbeing of Kentucky's Native Forests

Tina Tilley, Area Supervisor
Land Between the Lakes National Recreation Area
100 Van Morgan Drive
Golden Pond, Kentucky 42211

RE: Birmingham Ferry Salvage Project

December 7, 2016

Dear Supervisor Tilley and Mr. Westbrook,

Please consider these comments as an addition to our September 14, 2016 comments on the Birmingham Ferry Salvage Project. Last week we were able to spend some time in the field, and focused our time on the portions of two Core Areas that were included in the proposed harvest boundaries. As we stated in our previous comments, we strongly disagree with any decision to log in these Core Areas, including salvage logging. After seeing the extent of the tornado impacts on the ground we would like to restate this position. I will address some specific observations for each of those areas.

Pisgah Bay Core Area

The Pisgah Bay Core Area is an area that we are very familiar with. The forest, overall, has a strong “secondary old-growth” structure, with large diameter trees and snags in a well-developed second-growth forest. External characteristics suggest ages ranging from around 130 to 250 years in age. A white oak log and stump adjacent to the Core Area that we found in a debris pile from the cleanup off of Forest Road 115-B had nearly 200 growth rings, and had similar characteristics to many trees across this Core Area.

The tornado impacts we saw were by far the most severe adjacent to the road and gravel lot off of Forest Road 115-B. Inside the Core Area, in the 28 acres delineated for salvage harvests, the impacts were scattered and fairly minimal. While we did not have time for a quantitative analysis, I doubt even 5% of the canopy trees were impacted across the 28 acres. The areas of highest impact were confined to a couple of areas about ½ to 1 acre in size and with no more than 25% of canopy trees down. By any objective measure I don't think these impacts could be considered catastrophic. In addition, this area appears to have a deficit of larger-diameter down wood (coarse woody debris) relative to the old-growth management direction prescribed in the Area Plan. These down trees are a positive development in this regard. In general, would suggest that the term “catastrophic” be reserved for impacts to more than 50% of canopy trees, inducing a stand-replacing event and over a scale exceeding typical gap-phase disturbances (typically from < 0.5 up to 2 acres). The impacts to the Pisgah Bay Core Area are well below this threshold.

Cravens Creek North Core Area

On the north side of Cravens Creek, approximately 18 acres of Core Area have been included in a proposed harvest unit. This section of Core Area has only a few scattered individual trees down, excepting for one patch of significant blowdown covering about 1.5 acres at the confluence of two intermittent stream branches. A rough count estimated about 15 canopy trees down in this gap. The habitat created by the blowdown is complex, beneficial, and completely consistent with the old-growth direction of the Core Area prescription in the Area Plan. To get these logs out would require work in the streambed. Further, the downstream portion of the blowdown has a notable infestation of Japanese stiltgrass (*Microstegium vimineum*) and Japanese honeysuckle (*Lonicera japonica*). The ground disturbance associated with a salvage harvest will most certainly increase the infestation of these species, particularly the Japanese stiltgrass. There is also Tree of Heaven (*Ailanthus altissima*) in the stand, though it will probably respond similarly with or without a salvage harvest. Taking an action that would likely increase the extent of an invasive plant infestation in a Core Area would go against the clear intent of the Area Plan with regard to the Core Area designation.

Other area observations

One of the proposed salvage units is across Forest Road 118 from the Cravens Creek North Core Area, and includes the Scillian cemetery. We noticed that between the salvage unit and Forest Road 118 is a deep ditch. The only way of bringing machinery in and logs out appears to be through the roadbed that is the access to the Scillian Cemetery. There may be some other way of entering this unit that the Forest Service has identified, but we do want to make sure that the Scillian cemetery is not impacted.

We also looked at the proposed harvest area along the North-South Trail on the north and south sides of Forest Road 114. On the north side we noted only a handful of scattered trees had come down. Tornado impacts to the larger portion of the unit on the south side of Forest Road 118 also appear mainly restricted to scattered individual trees, excepting for one higher-impact area with thin, gravelly soils where about 30% to 50% of the trees came down in a limited area. Approving salvage harvests in these particular stands seems unnecessary at best, though not contrary to the Area Plan as with the Core Areas.

Thank you for considering these comments and observations as you work toward your decision on the project. I am more than happy to discuss this over the phone if you would find it helpful.

Sincerely,



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