



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, KY 4221

RE: Draft Scenery Management Plan

December 8, 2014

Dear Supervisor Tilley,

While we intend to submit more thorough comments on the Draft Scenery Management Plan prior to the current December 17th, 2014 deadline, I am writing to request that the comment period be formally extended and that the Draft Scenery Management Plan be properly treated as a Forest Plan amendment.

To begin with, per my email correspondence with Regina Roby and Brian Beisel, the 30 day comment period began with the posting of the press release on the LBL website on November 17th, 2014, but notice was not sent to the interested parties list until a full week later. While we appreciate Mr. Beisel's offer to accept comments through December, this does not constitute an actual extension of the legal comment period. After sharing information about the Draft Scenery Management Plan with various interested parties, it has become clear that this plan and its contents are controversial and of great import to many who hold LBL dear.

Regarding treating the Draft Scenery Management Plan appropriately as a Forest Plan amendment, the document itself states:

“The results of the Scenery Management System inventory and plan will result in design criteria for the Forest Plan and become an adopted section that will reside in Part 3.” (Draft Scenery Management Plan, p5)

The Record of Decision (ROD) for the Area Plan states:

3. Amendment and Revision

The LRMP will be amended or revised to adjust to changing circumstances. For example, the management goals, objectives, and standards stated for the Land Between the Lakes National Recreation Area in the Area Plan may, in the near future, be in need of updating or amending as a result of later assessments or analyses. The amendment process gives us the flexibility to adapt the decisions made today to the realities of tomorrow. We will provide opportunities for the public to be involved in future changes to the LRMP.

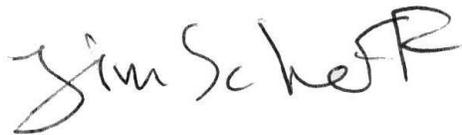
The LRMP is a dynamic instrument that can be changed with appropriate public involvement and analysis. Through the life of the LRMP, amendments may be needed to incorporate new information, new policy and direction, or changing values and resource conditions. Amendments will keep the LRMP current, relevant, and responsive to agency and public concerns. The LRMP also can be amended for specific projects if during project design it is determined that the best method of meeting goals and objectives conflicts with existing plan direction.

Amendments may be significant or non-significant. ***The Area Supervisor may implement non-significant amendments to the LRMP after appropriate public involvement and environmental analysis.*** The Regional Forester approves significant amendments. (ROD p21, emphasis added)

We find it to be clear in the plain language of both the Draft Scenery Management Plan and the Area Plan ROD that “appropriate public involvement and environmental analysis,” including scoping and an Environmental Assessment or other adequate document, are necessary for this endeavor.

As stated above, we plan to submit substantive comments regarding the Draft Scenery Management Plan prior to December 17th unless an extension and reevaluation of the process is formally granted.

Sincerely,

A handwritten signature in black ink that reads "Jim Scheff". The signature is written in a cursive, slightly slanted style.

Jim Scheff, Director
Kentucky Heartwood
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Berea, KY 40403

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