



KENTUCKY HEARTWOOD

Protecting the Beauty and Wellbeing of Kentucky's Native Forests

Jon Kazmierski, District Ranger
Cumberland District
USDA Forest Service
2375 KY 801 South
Morehead, KY 40351

RE: Commercial Harvest in the Beaver Creek Watershed

February 29, 2016

Dear District Ranger Kazmierski,

Thank you for this opportunity to comment on the proposed Commercial Harvest in the Beaver Creek Watershed. We have several concerns about this project which we raise below. Some of these concerns are issues we discussed in person at the public meeting you hosted on February 18th, 2016 in Frenchburg, while others concerns are newly raised. Regrettably, we were unable to visit all of the proposed harvest sites during the scoping period, and are only able to offer site-specific considerations at this time regarding the proposed units at the Carter Branch and Kendrick Ridge sites. While we plan to visit the remainder of proposed harvest areas before the open comment period on the Environmental Assessment, we highly suspect that many of the site-specific concerns observed in the aforementioned units are similarly evident in the remainder of the project area.

Overall, we have concerns regarding the assumptions behind this project and the allocation of limited resources toward commercial logging on the Daniel Boone National Forest (DBNF). Despite the fact that the public overwhelmingly opposes commercial timber sales on our public lands, scarce funds continue to be allocated to unnecessarily providing sawtimber to local mills at a loss of taxpayer funds. Public forests account for just 10% of forestland in Kentucky, and there is no need for the public to continue subsidizing the sale of federal timber. Furthermore, the DBNF budget for recreation has plummeted, all the while recreational use is skyrocketing. The Forest Plan estimated that recreational spending would be three times that of the timber program, and yet spending on the two programs was essentially equal in the last year for which we have seen reporting (FY 2013).

We also want to point here to issues with some of the statements and assumptions included in the handouts that you provided at the February 18th meeting, and which were posted to the DBNF website. To answer the question "Why is this project being proposed?," you state that one of the reasons is to "Manage vegetation in a way that mimics disturbance patterns from the past." We must point out here that when significant natural disturbance *did* indeed happen on the Cumberland District in 2003, the DBNF opted to use it as an excuse to lose money and cause immense controversy by selling timber on more than 4,000 acres. The impacts of ice storms are inherently natural, and part of the normal suite of developmental processes associated with native forests in our region. Now, in this project, we are seeing new logging proposed to induce disturbance based on the assertion that sufficient natural disturbance lacking. Obviously, these issues are extremely complex in their ecological and social dimensions. Nevertheless, the Forest Service appears here to be falling back on the old approach of looking for any excuse to sell timber.

The meeting document also states that the project is being proposed to "Reduce crowding of trees to improve their vigor in preparation for future changes in the environment." And yet, as we demonstrate below, the heavy reliance on regeneration harvests induces overstocking and, in many cases, the conversion of essentially healthy upland oak stands to exceedingly dense stands stump-sprouted maples and tulip poplars. You are proposing to create the very problem

you assert to be addressing. Again, selling timber appears to take primacy in the management considerations presented.

Finally, you present a tree density map that suggests that nearly all national forest lands in the vicinity of the project area are overly dense and will therefore be subject tree mortality, and you appear to imply that much more of the landscape needs to be harvested to address forest health concerns. This is a clear case of wrongfully applying the assumptions of agronomic forestry to an ecological management system. Timber health and forest health are not the same, though these considerations can overlap. Several of the stands we have observed in the project area are clearly within the stem exclusion phase of their development, which often extends, in our region, to forests of 70 to 90 years in age (often the ~6" to 8" red maples in the midstory of many stands are in the same age class as the overstory oaks, and not truly indicative of demographic transition). This stage of forest stand development is naturally associated with moderate to high levels of density-related tree mortality in what is sometimes referred to as "self-thinning." Furthermore, these dead and declining trees are an important and vital part of the forest ecosystem. While traditional forestry holds dear to the assumption that cavity tree, snag, and coarse woody debris formation are a loss to be avoided, this perspective is essentially economic and, in many cases, contrary to ecological considerations.

We do not expect to resolve all of these issues here. However, it is important that the Forest Service begin to acknowledge the bias lent to the philosophy of forests as a commodity in this and other projects. Our collective assessments of forest health, the impacts of disturbance, and the approaches we choose for achieving ecosystem goals and maintaining biodiversity are complicated and deserve broader considerations. We are often told that logging is just a tool to reach ecosystem goals, and not the goal itself. And yet when alternatives are provided that can meet the Purpose and Need of a project while limiting or eliminating commercial timber harvests and the predictable, associated impacts, these alternatives are either ignored or treated unfairly. Our Daniel Boone National Forest has far more management needs than there are resources to address, and the timber sale program, despite its traditional and dominant role in the agency, too often takes us away from addressing those needs.

We look forward to further discussing the specific issues presented here regarding the Beaver Creek project, and hope that we can find a way to move forward toward a more holistic, ecologically-oriented management of our national forest.

1. Public Notice

It has come to our attention that the Forest Service has failed to adequately notify adjacent and affected landowners of the project. The January 26, 2016 Project Update states that a number of "changes indicate a need to re-visit this project internally and externally to see if there are additional opportunities or environmental effects that can be addressed now." One of the specific changes listed is "Changes in adjacent landowners." During a field visit to the Kendrick Ridge site, we met with a relatively new landowner, Michael Albanese. The Albanese property is adjacent to the proposed harvest area, and the Forest Service and contractors must utilize the easement through the property, crossing immediately in front of and through their developed cabin area to bring in heavy equipment for logging operations and road reconstruction, as well as for hauling out logs. The impacts to their property and use of their property will be substantial. However, the Albanese family was not contacted by the Forest Service to notify them that there was an active proposal that would directly impact their land. We have suggested to Mr. Albanese that he communicate with you directly, and hope that he has taken opportunity to do so. However, we suspect that the Forest Service has similarly failed to contact other land owners that may be affected. This is doubly a failure in that the Forest Service recognized in the January 26, 2016 Project Update that "Changes in adjacent landowners" is one of the new issues to consider.

2. New System Roads

We were pleased to learn that the Daniel Boone National Forest is finally moving forward with a Travel Analysis Process (TAP) to comply with Subpart A of the Travel Management Rule (36 C.F.R. 212.5(b)). We look forward to

seeing the analysis put forth by the agency. We do know at this point, however, that the DBNF has more roads than there are resources to properly monitor or maintain. We know this from the documents that we have been able to review and from statements made to us by several DBNF personnel in recent years. This issue is exacerbated by the networks of uninventoried oil and gas access roads crossing national forest lands for which there is little or no data held by the Forest Service. In some cases, as we have previously documented and informed the Forest Service, these roads are violating Forest Plan standards and guidelines.

In this project, the Forest Service is proposing 0.9 miles of new system road construction to access lands for no other reason than removing timber. The proposed new system road goes into an area for which there is no other need for access. While road construction may be carried out by the timber contractor, these costs nevertheless must come out of the bid for the timber, increasing the cost deficit of the project. Further, the Forest Service and tax payers will be on the hook for unneeded road maintenance for decades. While we do not have good data yet on road expenditures and maintenance needs, it is worth pointing out here that the latest Monitoring and Evaluation Report (2013) shows a 4 million dollar maintenance backlog for recreational sites and a 3 million dollar backlog for building maintenance. Increasing road legacy costs while being unable to meet current forest maintenance needs is not responsible.

Contrary to what is being proposed on the Cumberland District, we have seen projects in recent years on the Redbird and Stearns Districts (Group One Redbird and Upper Rock Creek, respectively) tailored to eliminate or reduce new road construction by removing proposed harvest units that require new road construction. It has been explicitly conveyed to us that such decisions have been made because the DBNF cannot handle the existing road network, with new roads only adding to the burden. This is a responsible, pragmatic approach that we hope the Cumberland District will similarly adopt.

3. Stump Sprouting, Regeneration Failures, and Viable Alternatives

Our analysis of DBNF GIS data suggests that about 20,000 acres of the DBNF from the vicinity of the project area to the northern end of the DBNF were harvested between 1980 and 2003, with another 4,000 to 5,000 acres harvested since 2003 as part of the 2003 Ice Storm Recovery Project. Our observations from the project area and other areas across the DBNF harvested with regeneration methods (both clearcut and shelterwood) during this time show that the vast majority of harvested upland oak-hickory and oak-pine stands have been effectively converted to stands dominated by malformed, multi-stem, stump-sprouted maples and tulip poplar with very little oak regeneration. As we understand it, the Cumberland District has some of these lands approved for crop-tree release or other timber stand improvement treatments, but currently has plans to treat less than 10% of those lands harvested since 1980. This leaves a substantial and significant portion of the District and project area in an impaired and degraded condition with a vastly reduced capacity for producing hard mast that will likely continue for decades or centuries without appropriate management.

The DBNF has affirmed that forests in this condition are not desirable, and has allocated funds to manage and rehabilitate a small minority of these stands. For example, the February 6, 2012 scoping letter for the London Pre-Commercial Thinning Project states:

“Desired species include white oak, chestnut oak, Northern red oak, Southern red oak, black oak, shortleaf pine, hickory, yellow poplar, and other species. Trees with good form are those trees with full live crowns, straight single stems, and healthy appearing crowns with no signs of harmful insects or diseases.”

The scoping letter for the London Pre-Commercial Thinning project states that the project meets Forest Plan Goals 2 and 2.1, and Objective 2.1.A., which states “Within each stand, the relationship of basal area, number of trees, and average tree diameter is below the 80 percent stocking level.” Notably, meeting the same Objective 2.1.A is cited in the Beaver Creek project for the purpose and need of the commercial thinning prescription. Clearly, this purpose and need can be met through much-needed restoration of degraded young stands in the project area.

The Desired Future Condition for Prescription Area 1.K in the Forest Plan also makes several statements suggesting that allowing these former upland oak stands to remain in their induced maple-dominated condition goes against the direction in the Forest Plan. The Desired Future Condition for 1.K states:

“The desired diversity includes major plant communities such as mixed mesophytic, upland oak and yellow pine forests, which include American chestnut,”

And

“Oak and other hardwood regeneration is present across the prescription area.”

Under the Prescription Area Community Descriptions for Two-aged or Even-aged Young Forest, the Forest Plan states:

“Open, low basal area (10-20 square feet/acre) or no canopy, dense seedling/sapling forest: This habitat condition consists of a limited canopy layer of generally mid age trees with a (sic) dense seedlings and saplings of trees and shrubs. This will primarily occur where forests are regenerated using two-aged or even-aged silviculture. The conditions may occur in any forest type on any landscape position but will general occur in upland oak, yellow pine and ore mixed oak and yellow pine forest types.”

Nowhere in the direction for Prescription Area 1.K does the Forest Plan describe conversion of upland oak and oak-pine stands to red maple or fields of multi-stem coppiced trees. The language clearly suggests that the goal is regeneration oak and oak-pine forest types. Furthermore, Forestwide Standard DB-VEG-24 states that:

“Regeneration cuts on lands suitable for timber production must be done only where adequate stocking of *desirable species* (based on management objectives) is expected to occur within five years after the final cut. Within two-aged systems, the final cut is the establishment cut which leaves a residual overstory.” (emphasis added)

The Forest Service has routinely made clear the position that red maple is not a desirable species, and has implemented numerous projects across the forest, including midstory reductions, pre-commercial thinning projects, prescribed fire, and regeneration harvests, all with the express purpose of reducing red maple on the landscape and limiting the potential for future red maple dominance in historically upland oak forests.

As we note in the site-specific sections below, some of the proposed harvest units are directly adjacent to failed clearcut and shelterwood regeneration harvests. The Forest Service has to demonstrate clearly how it is that implementing a shelterwood harvest will be effective, when adjacent regeneration harvests from 20-30 years ago resulted in converting upland oak and oak-pine forests to stump-sprouted red maples and tulip poplar. Duplicating previous management prescriptions in essentially the same location while expecting different results does not make sense.

The Purpose and Need with relation to the proposed shelterwood harvests states that there is a need to provide for “areas (that) would enhance habitat for species such as Eastern towhee and yellow-breasted chat,” (Prescription Area 1.K, Goal 1.7) and to “Maintain 5 to 6 percent within each 5th level watershed in the 0-10 age class” (Prescription Area 1.K, Objective 1.A). Both of these stated needs could be met through appropriate management to restore the failed regeneration harvests in the project area. And as we note above, Objective 2.1.A, which is cited for the purpose and need of the commercial thinning prescription, is the same Objective cited in the London Pre-commercial Thinning Project. While the Forest Service would not be meeting Prescription Area 1.K, Goal 8 to “Provide renewable products on a sustainable basis when such provision is compatible with Desired Future Conditions,” such management could meet a wide range of other Forest Plan Goals and Objectives by restoring degraded forests,

providing for early successional habitat, and preserving mature forests in a manner that is more consistent with broad public sentiment and recreational use of the forest.

The Forest Service should, in good faith, fully consider an Alternative in the EA that utilizes restoration of the degraded stands to meet the Goals and Objectives described above.

4. Temporary Roads

Temporary roads are often treated in Forest Service analyses as if they have no real or lasting impacts on the environment. However, these newly constructed roads do have impacts and are not “temporary” in any reasonable sense of the word. Below are pictures of “temporary roads” in the 2003 Ice Storm Recovery Project area which were bulldozed into the hillside. As with untold miles of other such “temporary” earth moving, these road grades will be part of the landscape for generations. In the instances below, the roads are infested with non-native invasive plants, with Japanese stiltgrass, *Microstegium vimineum*, on the left and what appears to be Orchard grass, *Dactylis glomerata*, on the right. The infestation of *Microstegium* extended well into the forest. We also documented in the same general area a temporary road that had bulldozed through the roots of an old-growth tulip poplar to reach and harvest another old-growth tulip poplar.

The Forest Service proposes to build 1.0 miles of temporary road in the Beaver Creek project. The Forest Service estimates up to an additional 40 acres of skid trails and log landings, which have similar impacts as temporary roads. The impacts of these surface disturbances are integral to how the Forest Service implements timber sales on the Daniel Boone, but completely avoidable if the Forest Service chooses to allocate resources to much needed and alternative management activities. We also note here, with regards to skid trails and log landings, that Forestwide Standard DB-VEG-26 states that:

“No more than 10 percent of a harvest area should be in landings, skid roads, or exposed soil.”

And yet the project estimates 13% of the project area will be used for these purposes in clear violation of the Forest Plan.



5. Invasive Species

Invasive species are recognized as a serious problem on national forest lands, and the USDA Forest Service has established an Invasive Species Program. The website for the Invasive Species Program states:

The goal of the USDA Forest Service invasive species program is to reduce, minimize, or eliminate the potential for introduction, establishment, spread, and impact of invasive species across all landscapes and ownerships...The Chief of the USDA Forest Service has identified invasive species as one of the four critical threats to our Nation's ecosystems.

Executive Order 13112, dated February 3, 1999, specifically directs federal agencies to address invasive species concerns. Section 2 states:

Sec. 2. Federal Agency Duties. (a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law, (1) identify such actions; (2) subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner;

Logging is well known to induce the spread and establishment of noxious invasive plant species into forest interiors. There is an abundance of research and professional observations to this effect, and it is well known by the Forest Service and DBNF. The combination of canopy and soil disturbance associated with logging creates ideal conditions for many of the most troublesome invasive species to become newly established and create infestations where none were previously located. The DBNF has failed in recent project analyses to take a "hard look" at the effects of logging on the spread of invasive species. The Forest Service must appropriately analyze the effects of the proposed action with relation to invasive species.

As discussed below in **Section 8. Site Specific Concerns: Kendrick Ridge**, invasive plant species are known to be in the project area adjacent to proposed harvest units. And, as demonstrated above in **Section 4. Temporary Roads**, the Forest Service on the Cumberland District has failed to adequately control for invasive species in logging operations and directly caused infestations in forest interiors.

6. Stocking and Old-Growth

Kentucky Heartwood has previously expressed very detailed criticism of the Forest Service's reliance on the Gingrich stocking models as a proxy for forest health, especially with regards to the de facto exclusion of old-growth development through its application. The scoping document cites Forest Plan Prescription Area 1.K, Objective 2.1A in relation to thinning below the 80% stocking level. We realize that the project here is referencing and being consistent with the Forest Plan, but nevertheless think that the limitations and assumptions, both implicit and explicit, in the model need to be discussed in the context of forest management on the DBNF and this project. Because of the lengthy nature of the discussion, we are attaching to these comments the comments that we submitted on the Spring Creek Vegetation Management Project in the Redbird District (Spring Creek EA comments, September 3, 2014, Section 2. Old-Growth and Forest Development), and our predecisional objection for that project (Section III, page 7) which provides a response to the Final EA.

7. Economics

There is ongoing confusion and a paucity of data regarding the true financial costs of timber sales on the DBNF. Several national analyses have shown that the U.S. Forest Service loses a substantial amount of money planning and implementing commercial timber sales on our national forest lands. In recent years, the Forest Service has admitted as such, and moved to assertions that, while timber sales lose money, the sale of timber is merely a tool for necessary ecosystem management with the money recouped helping to offset the costs. Despite these admissions, the scoping notice estimates gross revenue from implementing the project at \$434,375 and costs of \$102,860, with a net revenue of \$331,515. While we understand that you have models and programs that you use to estimate financial costs and revenue from projects, the numbers presented to the public in the scoping document cannot be true.

This project offers a good opportunity for the Forest Service and the public to better understand the cost of timber sales on the DBNF. While we recognize that the Forest Service sees this project as ecosystem management, and not a timber sale, it is nevertheless a fairly standard commercial timber sale. The project name even makes it clear: Commercial Harvest in the Beaver Creek Watershed. The project has little in the way of associated actions, such as midstory thinning, precommercial thinning, prescribed fire, openlands maintenance, etc. Everything in the project is designed to service the commercial harvest of timber. As such, this project offers an excellent opportunity to understand and disclose the actual costs of timber sales on the DBNF.

We request that the Forest Service provide a comprehensive accounting of all costs associated with this project. These costs include, but are not limited to:

- Project planning and NEPA analysis
- Timber evaluations
- Wildlife surveys
- Archeological surveys
- Public meetings
- Endangered species analysis and consultation (including USFWS costs)
- Timber sale administration
- Any and all personnel costs associated with the project, including internal meetings, field work, correspondence, etc.

The public deserves to know the full financial costs associated with this project, and an informed decision cannot be made with the substantially misleading revenue figures provided in the scoping document. Only when the full, inclusive costs of this project are disclosed will the public and Forest Service be able to have a meaningful dialogue about this and other projects. It is imperative that actual, realized costs not be “swept under the rug” and removed from cost-benefit considerations. We understand that ecosystem management and proper analyses for projects are expensive. But with limited taxpayer funds available for managing our national forests, it is critical that the agency and the public be able to look at the numbers, and to focus resources on the most necessary, efficient, and effective management activities.

8. Site Specific Concerns: Kendrick Ridge

The Forest Service has proposed 105.6 acres of shelterwood harvest and 64.1 acres of commercial thinning, for a total of 169.7 acres of new harvests, on Kendrick Ridge. Approximately 90.4 acres were harvested with what appear to be shelterwood and clearcut methods in 1995. Those harvested stands are shown in the DBNF GIS database as “Yellow poplar-white oak-northern red oak” and “White oak-black oak-yellow pine” for the EV_NAME forest type. These forest type characterizations are not representative of actual forest conditions because harvesting resulted in a radical shift in forest composition to red maple and tulip poplar, as described in **Section 3. Stump Sprouting, Regeneration Failures, and Viable Alternatives**. The Forest Service needs to address this issue. An informed decision cannot be made with a reliance on faulty and misleading data.

The newly proposed harvests surround and are contiguous with the stands harvested in 1995, and, if implemented, will result in about 260 acres of the 280 acres above the cliffline having been harvested in just over 20 years. All but 65 acres of the forest harvested (past and proposed) will be through regeneration cuts. Considering the objective failures of the Forest Service to successfully regenerate oak at this site, the predictable results will be a wide swath of forest conversion and a long-term loss of most hard mast capacity. The full impacts of the planned harvests, past harvests, and actual current conditions of regenerating stands needs to be disclosed and analyzed. By most objective standards, the Forest Service is simply ruining the forest at this site in terms of future recreational, wildlife, and timber potential.

Furthermore, the Forest Service appears to be violation of the Forest Plan with the proposed harvest at this site. Forestwide Standard DB-VEG-22 clearly states:

“The maximum size of a temporary opening created by even-aged or two-aged regeneration treatments is 40 acres.”

The Desired Future Condition for Forest Plan Prescription Area 1.K states:

“Temporary forest openings are created by the removal and/or death of single trees, groups of trees (up to ¼ acre), and/or stands of trees (up to 40 acres).”

Stand 1116-40 is proposed for a shelterwood regeneration harvest of 51.9 acres, according to the GIS file `commercial_timber_harvest_areas_actual_tree_cutting`, as provided by the Forest Service. This 51.9 acres exceeds the maximum forest opening allowed by the Forest Plan. Stand 1116-46 includes an additional 34.2 acres of shelterwood harvest and is contiguous with Stand 1116-40, for a total opening of 86.1 acres – more than twice what is allowed in the Forest Plan. Approving the harvest as described would clearly contradict the Forest Plan and violate the National Forest Management Act.

We also noted during our visit that the 1995 harvests approved by the Forest Service included tree cutting directly on the bank of an ephemeral stream above a rock ledge. Additionally, we found invasive *Miscanthus* grass on an old logging road in the project area, and suspect that other invasive plant species are in the seedbed and dormant along the corridor.

9. Site Specific Concerns: Carter Branch

We have several objections the proposed management in the stands in this section of the project area. The proposal for this site includes 22.5 acres of shelterwood regeneration harvests and 97.3 acres of commercial thinning for a total of 119.8 acres of proposed logging. To service this logging the Forest Service proposes the construction of 0.9 miles of new system road and 0.7 miles of “temporary road.” Approximately 26 acres of adjacent and included stands were harvested in 1986 using what appear to be clearcut methods. As with the Kendrick Ridge site, these old clearcuts are erroneously labeled in the DBNF GIS database as “Yellow poplar-white oak-northern red oak,” and are in terrible condition dominated by multi-stem stump-sprouted maples, tulip poplar, and grape vine. The southern portion of this area is a narrow swath of public land surrounded by private land with some residential development, with all of the national forest land bound by private land proposed for harvest. A 17 acre section of private land immediately west of the proposed harvest area, and accessed by the new county road constructed along Carter Branch Road, has been cleared for some unknown purpose.

The Forest Service road entering the project area is Carter Branch Road, which is a National Forest System Road. This road is highly degraded, and collapsing into Carter Branch. While we appreciate that the Forest Service is interested in fixing or rerouting this road as part of the timber project, it nevertheless illustrates the Forest Service’s inability to maintain the existing road system. This road has clearly been eroding and causing water quality issues for some time. If the Forest Service had resources to maintain the existing road system, then why has this road been

allowed to deteriorate and fall into the stream? As we point out in **Section 2. New System Roads**, the Forest Service needs to eliminate unnecessary roads, not construct more and add them to the system as proposed.

Along Carter Branch and the lower-slope section of Stands 1095-30 and 1095-26 is a large, tangled, and well-established mess of multiflora rose and Japanese honeysuckle. A powerline right-of-way cuts through Stand 1095-26 (which is proposed for a shelterwood regeneration harvest) and clearly has multiflora rose established in it. It appears as if invasive lespedeza is established through the area as well, and we suspect a high population of numerous other invasive plant species will become apparent once the growing season begins. There is simply no way to harvest these stands, particularly stand 1095-26 with a regeneration harvest, without directly causing a severe infestation of multiple invasive plants in these stands. We refer here to our broad concerns regarding invasive species raised in **Section 5. Invasive Species**.

The lower slope of Stand 1095-26 appears to be a young to mid-age stand of primarily white (though possibly chinquapin) oak. The DBNF GIS database states that the stand was originated in 1908, but the lower portion of this stand is clearly younger and likely within the underrepresented 51-70 year age classes represented in the graph titled *Distribution of average overstory ages by decade for stands in the Beaver Creek Project Area* provided by the Forest Service during the February 18th public meeting in Frenchburg. While we have not cored any trees to confirm canopy age, the Forest Service does need to take a more detailed look at this portion of the stand. We have frequently found that the delineation of stands on the DBNF fails to capture multiple age classes, though usually our observations center on the failure to recognize old-growth inclusions. The upper portion of Stand 1095-26, excluding the powerline ROW, is a nice, mature oak forest with a *Kalmia* understory. A regeneration harvest on this site will almost certainly convert it to a red maple stand with numerous invasive plant species in the understory. The Forest Service has to demonstrate how such a conversion would be a beneficial, effective management action enhancing diversity and forest health. We contend that it would be otherwise.

We have visited the western half of Stand 1095-23, though not yet gone as far as Stand 1095-22. What we have seen is some lovely, quiet, and isolated forest hollows with mature forest leading to Cave Run Lake. There is no compelling reason whatsoever to build a new, dead-end system road in to this area with no other public or necessary administrative uses.

10. Conclusion

Again, we thank you for the opportunity to submit comments regarding the Commercial Harvest in the Beaver Creek Watershed. We also thank you for your responsiveness to our data requests and willingness to discuss this project. It is our sincere hope that we can resolve many or all of the issues raised in this letter.

Sincerely,



Jim Scheff
Director
Kentucky Heartwood
P.O. Box 1486
Berea, KY 40403
Ph:(859) 334-0602
E: quercusstellata@gmail.com