



Response to Comment (By Author)

Project: Commercial Timber Harvest in the Beaver Creek Watershed (25765)
Comment Period: Other - 30-day comment
Period Dates: 7/19/2016 - 8/17/2016 **Generated:** 11/29/2016 9:21 AM

Author(s)	Comment	Response
albanese1@fuse.net, Anon	I am an owner of property that abuts the Daniel Boone National Forest. Please do not clear cut the forest as it will greatly impact the value of our property and the aesthetic value of our experience from our property.	
albanese1@fuse.net, Anon	I also think you intend to use an easement road on our property and I think this easement will suffer greatly. The road will need to be upgraded and maintained. As a property owner I have not been contacted about this. Our property is at 1880 Tom Stamper Rd. Menifee County.	This landowner was contacted during the re-scoping process. The response is documented in the consideration of comments document found as part of the project record and posted on the Forest webpage.
albaneseconcrete@fuse.net, Anon	I would like to reiterate my concerns that we sent to you on February 29th 2016	
Asplen, Xyara	Commercial Harvest in the Beaver Creek Watershed Dear Mr. Kazmierski,	Support for Alternative B

Author(s)	Comment	Response
	<p>I'm writing to you today, as I'm sure so many others have done, to urge you to hear the voices of the people whose public lands are entrusted to your care.</p>	
	<p>The Proposed Action in the Beaver Creek Watershed would be a truly unfortunate use of the Forest Service's skills and resources. It troubles me so much when I spend time in areas that have been logged (often with little care for the health of the soil, the hydrology, or the plants left standing) and then essentially abandoned, leading to a mess of stump sprouts, invasive species, and tick habitat. I would dearly love to see some of the forest management responsibilities of the USFS go toward restoration of these areas--many of which are adjacent to the currently proposed project area--instead of cutting relatively healthy forest (at taxpayer expense).</p>	
	<p>Obviously, my first choice is adamantly that you reject this project entirely, and redirect those energies toward positive impact forestry in the areas so desperately in need of it. My second choice is for you to adopt Alternative B, which at least includes the use of native species in replanting, mechanical crop thinning treatment in ten years to somewhat mitigate the mess we see in other logged sites in the area, some effort to control the spread of invasive plant species without the use of herbicides, and a limit on the construction of new roads--which, as you know, are conduits for invasive species, erosive nightmares, and beyond the funding and ability of the USFS to adequately maintain existing roads, let alone new ones.</p>	
	<p>This is our land, and I know that so many of you who work for</p>	

Author(s)	Comment	Response
	the USFS became foresters because you, too, believe humans can be a part of woodland ecosystems in mutually beneficial ways. Please, try to remember this, and leverage your position, your skills, and your resources toward the stewardship of our public lands, not the shortsightedness of extraction.	
	Sincerely, Xyara Asplen 554 Wolf Gap Rd Berea, KY 40403	
Bauer, Robert	We support the Forest Services' efforts to manage our federal lands in a thoughtful and sustainable manner as outlined in the EA for the proposed Beaver Creek project.	General expressions of support for active management of the National Forest
Bauer, Robert	The proposed action will address needs pointed out in the Forest Plan by creating desired future conditions for the forest area. The management action that will favor longer lived and nut producing trees will also improve wildlife habitat while increasing the value of the forest for any future management that could possibly create economic return to the local community.	General expressions of support for active management of the National Forest
Bauer, Robert	The adjustments in the proposed actions have resulted in a compromise that considers all sides of the issue but still allows for management and meeting the objectives of the approved Forest Plan.	General expressions of support for active management of the National Forest

Author(s)	Comment	Response
Bauer, Robert	Although the project size may be relatively small, the benefits to species diversification, wildlife habitat and forest fire suppression are important. The Wildlife Resource Report that was compiled to support the project strikes us as a thoughtful, reasonable approach to managing this portion of the Daniel Boone. The combination of commercial thinning and shelterwood treatments appear to be an effective approach to allow the predominant oak species to thrive and promote nut-producing stands that will benefit wildlife in the area.	General expressions of support for active management of the National Forest
Bauer, Robert	The lack of active management of federal lands negatively impacts the health and sustainability of the forests. Trees need sunlight to grow, absorb carbon and provide shade and shelter for vegetation and animals. Overgrown forests choke off smaller trees and limit diversity as dominant species take over. Shade intolerant trees such as oak, walnut and ash are particularly vulnerable. Appropriate harvests also positively contribute to reducing forest carbon emissions. In 2011, the U.S. Forest Service Forest Products Laboratory found that regions with the highest rates of forest product output (harvested raw materials) had the lowest rates of deforestation as well as the lowest rates of forest carbon emissions.	General expressions of support for active management of the National Forest

Author(s)	Comment	Response
Bauer, Robert	<p>Wildlife benefits from harvesting and thinning activities. Some, like the ruffed grouse thrive in sunny, open areas. Others prefer regenerating forests that result from cutting. A varied and changing forest landscape, some from natural causes, but also from management practices including thinning and harvesting, provides a wide variety of habitats which support and grow native species. Species specifically identified as benefiting from thinning activities on the Daniel Boone include the cerulean warbler, the summer tanager, the eastern towhee and yellow-breasted chat.</p>	<p>General expressions of support for active management of the National Forest</p>
Bauer, Robert	<p>We are also strong proponents of management activities that reduce the potential for wildfire on our national forest lands as well as actions that allow for fast and efficient suppression efforts. In 1991, fire suppression programs accounted for 13% of USFS appropriated funds. In 2015, this figure grew to over 50% with additional increases anticipated in the future. In addition, since 2002, the Forest Service has transferred \$3.4 billion from non-fire suppression programs to fight fires, leaving other vital programs, including Timber Harvest programs, underfunded and underutilized. Proposed activities in the Beaver Creek project will improve conditions of the land and limit fire potential. The plan will also create limited logging roads that can be used for fire suppression activities if a fire does occur.</p>	<p>General expressions of support for active management of the National Forest</p>

Author(s)	Comment	Response
Bauer, Robert	<p>Declining timber sales negatively impact countless wood products businesses, local communities and schools that rely on the jobs and tax base provided by the industry. In 2010, the United National Economic Commission noted that "...there is growing concern that the US hardwood resource is now being severely underutilized." (2010 Forest Products Market Review). Proposed harvesting activities would funnel 5,849 hundred cubic feet of raw materials into the local economy and generate approximately \$350,000 for the U.S. Forest Service budget.</p>	<p>General expressions of support for active management of the National Forest</p>
Burke, Adam	<p>Personally I live adjacent to a commercial logging operation, and that is bad enough; I can't legally do anything about the destructive practices that impact the land I live on and the creek that flows through it and all the plants and animals I share the place with.</p>	
Burke, Adam	<p>It hurts to see healthy, diverse forest logged leaving a mess of stump sprouts, man-sized ruts, bare and eroding slopes, and an influx of invasive species.</p>	<p>The effects of the project on non-native invasive plants is disclosed on page 4-33.</p>
Burke, Adam	<p>We can't afford any more shortsighted extraction. I know the forest service has a right to commercial timber harvest, but the forest service is funded by taxpayers to care for forests. When in polls most Americans don't want to see logging on their public national forests, opposition to a commercial timber harvest by concerned citizens needs to be considered genuinely.</p>	<p>Support for Alternative C</p>

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Caye, Keith	<p>commercial harvest in the beaver creek watershed area</p> <p>I wish to express my opposition to the proposed timber harvest in the Beaver Creek watershed area.</p> <p>Given past harvests management has been poorly followed up with extensive invasion of exotic species, track scarring which may take literally thousands of years to erase, erosion and habitat loss to the native fauna I believe it is irresponsible to propose more harvesting of timber. I firmly believe there is more value in allowing the forest to develop into old growth.</p> <p>Sincerely, Keith Caye</p>	Support for Alternative C
Collins, David	<p>The concerns I wish to express relate to the philosophy of the US Forestry Service toward management of the national forests.</p>	<p>The effects of the project on non-native invasive plants is disclosed on page 4-33.</p>
Collins, David	<p>Past harvest have created opportunities for invasive species, stump sprouts and weak generation of new forest trees. Road construction for these harvests further damages our forests for many years.</p>	<p>Estimated types of product to be remove under this project are in project record. Approximately 20% of the material will be pallet-grade or small round wood.</p>
Collins, David	<p>The trees often removed are young and small, useful for building pallets and little else.</p>	<p>Effects to recreation are addressed on pages 4-33 and 4-34.</p>
Collins, David	<p>Young to medium aged trees have the opportunity to develop into a beautiful mature forest with many recreational users, highly satisfied with a chance to see and experience nature.</p>	

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Collins, David	The ecological ideal I would encourage would be to allow the forest to manage itself in most, it not all situations.	Support for Alternative C
Collins, David	The creation of hiking trails, and primitive campsites would take less resources from the US Forest Service, and permit citizens of KY, other US states and visitors from around the world to see this amazing topography, forests, plants and unique environment.	Effects to recreation are addressed on pages 4-33 and 4-34.
Cook, Kelly	Commercial Harvest in the Beaver Creek Watershed Please do not log in this forest. We need to protect Kentucky's forest for our future generations. These trees have been with us for a long time and are essential to us.	Support for Alternative C
Cooper, Dave	Thank you, Kelly Cook Beaverr Creek I would like to submit these comments regarding the proposed logging plan for Beaver Creek. While I am opposed to any logging in the DBNF, I have found the forest areas around Cave Run Lake to be so degraded already from past logging that they are virtually unusable by the public during the summer. Whenever I have tried to mountain bike or walk my dog on forest roads around Cave Run I have noticed many aggressive invasive species and my legs and feet become covered with	Support for Alternative B

Author(s)	Comment	Response
	<p>insect bites. Logging and not allowing these forests to recover and stabilize has turned the forests around Cave Run into a terrible place.</p>	
	<p>Let the forests recover for a few hundred years before logging any more. Reduce the invasive species and the ticks and chiggers and especially the seed ticks/aka Turkey Mites that are being generated by excessive populations of game species.</p>	
	<p>Plan B is the better option if "No Logging" is not an option.</p>	
	<p>Dave Cooper 608 Allen Ct Lexington KY 40505</p>	
	<p>Dave Cooper - Kentucky Pallet Artist The Whippoorwill Festival - Skills for Earth-Friendly Living July 7-10, 2016</p>	
Danks, Zachary	<p>1. This commercial timber harvest and associated activities (e.g., roads) will improve forest habitat in the Habitat Diversity Prescription Area of the</p>	General expressions of support for active management of the National Forest

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	District, as identified in the Forest Plan.	
	Such work supports our agency's Wildlife Action Plan' and specific species management plans.	
	We also recognize and support the project's two other goals of improving forest vigor (i.e.,	
	health and resiliency) and of providing wood products for the local economy. We feel that such	
	compatibility provides an efficient and effective means of, and important justification for, active	
	forest management on the DBNF. We do not support Alternative C (No Action), which offers no	
	additional work to improve wildlife habitat or forest health beyond routine Service activities.	
	The planned commercial thinnings and two-aged shelterwood harvests will diversify forest stand	
	structure, within-stand food resources for wildlife (i.e., hard and soft mast), and — in conjunction	
	`http://fw.ky.gov/WAP/Pages/default.aspx	
	Jm	
	with herbicide treatments to control resprouting of less desirable species before and after harvest	

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	— will improve future plant species composition. These treatments represent both short- and longterm	
	habitat improvements, which are critically needed for wildlife and to address oak decline in	
	eastern hardwood forests	

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Danks, Zachary	<p>An important short-term benefit of thinning is the ensuing development of the forest understory underneath a more open but intact overstory. A well-developed understory of forbs, grasses, vines, saplings and resprouts provides important structural cover for ground-nesting birds, including important gamebirds like the wild turkey (<i>Meleagris gallapcivo</i>) and ruffed grouse (<i>Bonosa umbellus</i>). Both turkey and grouse use thinned hardwood stands during spring and summer for nesting and brood-rearing; such stand often have greater insect abundance, which juvenile and adult turkey and grouse consume during this time (Harper et al. 2001, Haulton et al. 2003). Improving the amount and arrangement of reproductive habitat is the recommended means of improving reproduction and recruitment in these species (Devers et al. 2007, Jackson et al. 2005, Jones and Harper 2007, Tirpak et al. 2010).</p>	General expressions of support for active management of the National Forest

Author(s)	Comment	Response
Danks, Zachary	<p>Longer-term benefits of thinning include the potential for better acorn production through crown development of retained dominant or codominant oaks, and for oak regeneration from added sunlight and competition control. Acorns are an important fall and winter food source for turkey and grouse and a plethora of other bird and mammal species. However, acorn production is variable between years, leading to a fluctuating food supply for grouse in oak-hickory forests. This highlights the need to promote acorn production and oak regeneration across time and space. Also, as mentioned in the EA the open canopy structure after thinning should increase abundance of the cerulean warbler — a species conservation concern.</p>	<p>General expressions of support for active management of the National Forest</p>
Danks, Zachary	<p>Young, “early successional” forest habitats 0--20 years old with characteristically high woody stem densities offer protective cover for ground-nesting birds like ruffed grouse (Dessacker and McCauley 2001) and, as described in the EA, for DBNF management indicator species such as</p>	<p>General expressions of support for active management of the National Forest</p>

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	<p>yellow-breasted chats and eastern towhees. Such stands also offer abundant soft mast and forage</p> <p>for many species (Greenberg et al. 2011). Increasing the extent of young forest habitat through</p> <p>regeneration harvests will be required for the persistence of ruffed grouse at recreational</p> <p>densities. Although clearcutting is a standard and important technique for regenerating young</p> <p>forest and managing for ruffed grouse in particular, shelterwood harvests offer great potential for</p> <p>such habitat improvement in the Appalachian region (Jones and Harper 2007). Like clearcuts,</p> <p>shelterwoods regenerate harvested stands but retain clumps of mast-bearing trees within the</p> <p>stand. By providing cover and food for grouse in the same stand, grouse movements and home</p> <p>ranges should be reduced, leading to less predation risk and possibly higher grouse densities</p> <p>(Harper et al. 2011). Two-aged shelterwoods offer the advantage over regular shelterwoods of</p> <p>retaining hard mast within the stand for a much longer time (i.e., possibly through the next</p>	

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Danks, Zachary	rotation length) — an important consideration given the 25—40 years typically required for mast production in oaks. We recommend no more than about 30 square feet per acre for ideal grouse management; Dessacker et al. 2006 In closing, the KDFWR supports the Cumberland District's proposed project because of the potential benefits to wildlife. We look forward to the eventual results of the project, and to	General expressions of support for active management of the National Forest
Daws, RB	continued collaboration with District on future projects. Against any logging or visual change at Cave Run Lake in Kentucky I would like to voice my concern against any logging or visual changes of any type at Cave Run Lake in Kentucky. My family likes to fish there and the only reason that I drive 2.5 hours to get there is the visual beauty, peace and quiet, and clean undisturbed natural treelines. I do not want to see that destroyed in any way please.	The effects to the visual resources of the watershed are disclosed on page 4-11 of the EA.

Author(s)	Comment	Response
Fischer, Joel	<p>Commercial Harvest in the Beaver Creek Watershed</p> <p>Greetings,</p> <p>I am writing to oppose the activities proposed in the "Commercial Harvest in the Beaver Creek Watershed".</p> <p>I am opposed to logging in our National Forests.</p> <p>I am opposed to road building in our National Forests.</p> <p>I am opposed to herbicide use in our National Forests.</p> <p>I am opposed to commercial timber / lumber activity in our National Forests.</p> <p>Sincerely,</p> <p>Joel Fischer 396 Ewing St Frankfort KY 40601</p>	Support for Alternative C
Gardner, Katie	<p>I am opposed to the commercial harvest and road construction in the Beaver Creek Watershed.</p>	Support for Alternative C

Author(s)	Comment	Response
Gardner, Katie	This area is one of the most beautiful and pristine forests I've been in and the commercial logging that you are proposing would not only decrease the biodiversity in this special forest	Support for Alternative C
Gardner, Katie	but also ruin the peaceful, untouched aesthetic of the area for recreational purposes.	Effects to recreation are addressed on pages 4-33 and 4-34.
Gardner, Katie	Please consider adopting Alternative B. Please help protect our public land and save our tax dollars for work that does not come with such a high cost, both financially (in funds lost to road maintenance and logging) and biologically.	Support for Alternative B
Hines, Martina	We have some concerns regarding the proposed project. Specifically, stand 1116-46 is adjacent and uphill from a high quality occurrence of Appalachian mesophytic forest. Harvesting is likely to promote impacts onto this stand due to inadvertent introduction of exotic species, and changes in microclimate that can lead to a compositional changes. Excluding the section of the proposed harvest area adjacent to this sensitive community and allowing for some buffer would reduce the chance of negative impacts on the site.	There will be at least a 300 foot buffer of undisturbed forest (Cliffline buffer) between the proposed harvest activity and the area of concern.
Hines, Martina	In general, we are disappointed that the Forest Service has not included the likely spread of exotics as an "effect" of the proposed activities within the scoping notice.	The effects of the project on non-native invasive plants is disclosed on page 4-33.
Hines, Martina	While woodland and open habitat can effectively lead to improved conditions for some rare species, a long-term management strategy is required to properly restore and maintain this habitat, involving repeated thinning, burning and exotics control.	The proposed treatments are not designed to create woodland habitat.

Author(s)	Comment	Response
Inman, Tom	While the project is small in the scope of the forest, we believe it provides outstanding benefits to the local community, to wildlife habitat, fire suppression and species diversification. We believe the commercial thinning and shelterwood treatments are an effective approach to allow the predominant oak species to thrive and promote stands that will benefit wildlife.	General expressions of support for active management of the National Forest
Inman, Tom	The lack of active management of federal lands negatively impacts the health and sustainability of the forests. Trees need sunlight to grow, absorb carbon and provide shade and shelter for vegetation and animals. Overgrown forests choke off smaller trees and limit diversity as dominant species take over. Shade intolerant trees such as oak, walnut and ash are particularly vulnerable. A varied and changing forest landscape, some from natural causes, but also from management practices including thinning and harvesting, provides a wide variety of habitats which support and grow native species. Species specifically identified as benefiting from thinning activities on the Daniel Boone include the cerulean warbler, the summer tanager, the eastern towhee and yellow-breasted chat.	General expressions of support for active management of the National Forest
Inman, Tom	We appreciate the opportunity to express our support of the Forest Service and the proposed timber harvest activities related to the Beaver Creek Project. We look forward to this harvest becoming a reality.	General expressions of support for active management of the National Forest

Author(s)	Comment	Response
Inman, Tom	Proposed activities in the Beaver Creek project will improve conditions of the land and limit fire potential. The plan will also create limited logging roads that can be used for fire suppression activities if a fire does occur. Declining timber sales negatively impact countless wood products businesses, local communities and schools that rely on the jobs and tax base provided by the industry. Proposed harvesting activities would funnel 5,849 hundred cubic feet of raw materials into the local economy and generate approximately \$350,000 for the U.S. Forest Service budget.	General expressions of support for active management of the National Forest
Inman, Tom	We are also strong proponents of management activities that reduce the potential for wildfire on the national forest lands as well as actions that allow for fast and efficient suppression efforts. The Forest Service has transferred \$3.4 billion from non-fire suppression programs to fight fires, leaving other vital programs, including Timber Harvest programs, underfunded and underutilized.	General expressions of support for active management of the National Forest

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Josh, Anon	<p>"Commercial Harvest in the Beaver Creek Watershed</p> <p>Logging of our public forests is an absolutely terrible idea. In an increasingly paperless World coupled with the advances in modern building this is a completely unnecessary action. If we don't stop it now, when will it end? In ten years the forest might be completely done away with. Then try to explain that to the kids who all has asthma and who have never really connected with nature because it's not there anymore. Please stop this natural catastrophe.</p> <p>Josh Lutz</p>	Support for Alternative C
Judy, Carol	<p>Powered by Cricket Wireless</p> <p>Commercial Harvest in the Beaver Creek Watershed is not something i would support. this national forest is for the generations of today and all the tomorrows you can imagine, and</p>	Support for Alternative C
Koplowitz, Sue	<p>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).</p>	<p>Financial data is found in the EA on pages 2-3 and 4-35 to 4-36.</p>
Koplowitz, Sue	<p>Despite the fact that the public overwhelming 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.</p>	<p>Financial data is found in the EA on pages 2-3 and 4-35 to 4-36.</p>
Koplowitz, Sue	<p>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.</p>	<p>Financial data is found in the EA on pages 2-3 and 4-35 to 4-36.</p>

Author(s)	Comment	Response
Koplowitz, Sue	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).	Effects to recreation are addressed on pages 4-33 and 4-34.
Koplowitz, Sue	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.	
Koplowitz, Sue	Now, in this project, we are seeing new logging proposed to induce disturbance based on the assertion that sufficient natural disturbance lacking.	The purpose and need for the project is disclosed on 1-2 of the EA.
Koplowitz, Sue	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 purpose and need for the project is disclosed on 1-2 of the EA.
Koplowitz, Sue	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.	The estimated condition of the treated areas following harvest is found on pages 4-29 through 4-32.

Author(s)	Comment	Response
Koplowitz, Sue	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."	Tree density in the watershed is addressed on pages 1-3, 3-22 to 3-23, and 4-30 to 4-32 of the EA. The treatment of dead, dying and damaged trees is addressed on page 1-1 of the EA.
Koplowitz, Sue	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.	Tree density in the watershed is addressed on pages 1-3, 3-22 to 3-23, and 4-30 to 4-32 of the EA. The treatment of dead, dying and damaged trees is addressed on page 1-1 of the EA.

Author(s)	Comment	Response
Koplowitz, Sue	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.	Development and consideration of a range of alternatives is disclosed Chapter 2 of the EA.
Koplowitz, Sue	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 investigation and remediation of 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.	

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Koplowitz, Sue	<p>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." A new landowner, Michael Albanese and 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 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.</p>	<p>The process used to contact adjacent landowners is documented on page 11 of the Public involvement comments and responses document that is part of the project record and is found on the Forest webpage.</p>

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Koplowitz, Sue	<p>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 driving the DBNF roads daily and 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, 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.</p>	

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Koplowitz, Sue	<p>Sprouting, Regeneration Failures, and Viable Alternatives 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. Observations from the project area and other areas across the DNBH 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. 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.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
Koplowitz, Sue	<p>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</p>	<p>The estimated condition of the treated areas following harvest is found on pages 4-29 through 4-32.</p>

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	<p>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 oakpine 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</p>	

Author(s)	Comment	Response
Koplowitz, Sue	<p>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.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
Koplowitz, Sue	<p>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.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
Koplowitz, Sue	<p>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.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>

Author(s)	Comment	Response
Koplowitz, Sue	<p>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. 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, <i>Microstegium vimineum</i>, on the left and what appears to be Orchard grass, <i>Dactylis glomerata</i>, on the right. The infestation of <i>Microstegium</i> extended well into the forest. 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 oldgrowth 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</p>	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.
Koplowitz, Sue	<p>The Forest Service must appropriately analyze the effects of the proposed action with relation to invasive species.</p>	<p>The effects of the project on non-native invasive plants is disclosed on page 4-33.</p>

Author(s)	Comment	Response
Koplowitz, Sue	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.	The effects of the project on non-native invasive plants is disclosed on page 4-33.
Koplowitz, Sue	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 Forest Service considered and responded to the concerns expressed related to the use of stocking charts such as those developed by Gingrich during the comment consideration process. The 'Public involvement comments and responses' document found in the project record and Forest Webpage contains this response on page 19.
Koplowitz, Sue	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	Financial data is found in the EA on pages 2-3 and 4-35 to 4-36.

Author(s)	Comment	Response
Koplowitz, Sue	<p>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.</p>	Furthermore, the Forest Service appears to be violation of the

Author(s)	Comment	Response
	<p>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. As noted during KY Heartwood's 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, invasive Miscanthus grass was found on an old logging road in the project area, and it is suspect that other invasive plant species are in the seedbed and dormant along the corridor. 9. Site Specific Concerns: Carter Branch There are 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</p>	<p>This comment is a copy of comments submitted during the re-scoping for this project by Jim Scheff of Kentucky Heartwood, Inc.. These comments were considered and responded to during that period. Those responses are part of the project record and are published on the Forest webpage.</p>

Author(s)	Comment	Response
	<p>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 pointed 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 also suspected a</p>	

Author(s)	Comment	Response
	<p>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. There are 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 no trees were cored to confirm canopy age, the Forest Service does need to take a more detailed look at this portion of the stand. Frequently found is that the delineation of stands on the DBNF fails to capture multiple age classes, though usually 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. Lovely, quiet, and isolated forest hollows with mature forest leading to Cave Run Lake have been observed. 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</p>	

Author(s)	Comment	Response
lanebold@earthlink.net, Anon	<p>you for the opportunity to submit comments regarding the Commercial Harvest in the Beaver Creek Watershed. It is our sincere hope that we can resolve many or all of the issues raised in this letter.</p> <p>We understand that since 1980, the Forest Service has logged about 25,000 acres, or a full one-quarter of the national forest lands that make up the northern end of the Daniel Boone National Forest from Cave Run Lake to the forests just north of Morehead.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
lanebold@earthlink.net, Anon	<p>We appreciate the development of alternatives in response to earlier comments.</p> <p>(Alternatives A and B). The Cumberland Chapter Sierra Club maintains that the best course of action is to leave the trees standing and prefer minimal road building activity.</p> <p>We find Alternative B to be highly preferable and less impactful than the Proposed Action or Modified Proposed Action.</p>	<p>Support for Alternative B</p>
lanebold@earthlink.net, Anon		

Author(s)	Comment	Response
	<p>Within our concerns, we note that the Forest Service is responsible for maintaining over 1,300 miles of the nearly 2,000 miles of roads crossing the Daniel Boone. But the agency does not have adequate funds to do so. The Forest Service nationally has a road maintenance backlog in the billions of dollars, maintaining only about 20% of system roads to standard. National forests are under a directive to bring road maintenance costs closer to actual funding levels through the elimination of unneeded roads.</p> <p>In your Environmental Assessment, you state: "The majority of (national forest system roads) in the watershed are not being maintained to their designated standards." If the Daniel Boone National Forest cannot maintain existing roads to their designated standard, then we have concerns with additional road building for the purposes of selling timber.</p>	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.

Author(s)	Comment	Response
lanebold@earthlink.net, Anon	<p>We appreciate the Forest Service including steps to remove invasive species in harvest areas. Unfortunately logging creates ideal conditions for invasive species to proliferate in the forest interior, particularly in areas where logging is happening in close proximity to existing infestations.</p>	<p>The effects of the project on non-native invasive plants is disclosed on page 4-33.</p>
lanebold@earthlink.net, Anon	<p>We understand in your proposal includes actions to thin red maples using a fell-and-leave approach to allow more growing space for oaks, hickories and pines for succession. We support techniques that avoid herbicides, and believe that if the Forest Service is going to log area, there must be a commitment on follow-through to limit long-term degradation of forest composition. Our preference is to avoid commercial logging operations entirely and allow the original intact forest to stand, rather than cut and then have to mitigate for composition a decade after cutting. However short of that, we prefer plans long-term, non-chemical management.</p>	<p>The estimated condition of the treated areas following harvest is found on pages 4-29 through 4-32.</p>

Author(s)	Comment	Response
lanebold@earthlink.net, Anon	<p>The Sierra Club does not support commercial logging on public lands. We see in your comments that concerns about logging on public lands are not a relevant issue, because current laws allow the practice. However we believe the forest service must consider if they should be logging a particular area, and the public's views of appropriateness of a logging project are important.</p>	Support for Alternative C
Loiacono, Michael	<p>I am opposed to the proposed commercial logging in the Beaver Creek Wilderness near Cave Run Lake. I do not believe that this is a responsible way to "improve habitat for various species of plants and animals."</p>	Support for Alternative C
McGrew, S	<p>logging degrades important habitat for many birds and mammals</p>	Effects to bird and animals is presented on pages 4-20 to 4-24
McGrew, S	<p>permanently destroys public goods for private purposes</p>	
McKnight, John	<p>Since the conservation groups would like to see a minimal disturbance of the forest, as a member of one of these groups, I feel that Alternative B would be the better option.</p>	Support for Alternative B
Melendez, Alice	<p>Personally, I do not support the commercial harvest of timber on State or National Park lands</p>	Support for Alternative C

Author(s)	Comment	Response
Melendez, Alice	I'm aware that it is permitted, but I think that the best way for the government to hold the lands in trust for the citizenry is to create space where ecosystems are permitted to evolve with relatively minimal human involvement. This kind of space is so rare and precious in this time.	Support for Alternative C
Melendez, Alice	As far as the specific proposal, my primary concerns revolve around invasive species and decline of stand quality where roads and cuts open the country up.	Effects related to invasive species are found in the EA on page 4-33. Effects related to stand quality are found on pages 4-28 to 4-32.
Melendez, Alice	I support Alternative B with reduced road building, no use of herbicides, management for crop trees after 10 years, and planting of native fruiting trees on the log landings after clean-up. I use the Daniel Boone forest as a hiker and camping with my kids.	Support for Alternative B
Mincey, Sarah	I do not think that harvesting timber in this watershed is necessary nor the best course of action. While I do believe that the Forest Service should be engaging in management activities in this watershed and analysis area, I am of the opinion that the priorities for the area should focus on remediating previously harvested stands, treating non-native invasive plants, addressing road maintenance and erosion issues, and ensuring an adequate and sustainable trail system.	Support for Alternative C
Mincey, Sarah	Given the options presented in the EA, I urge you to choose Alternative C, the "No action" alternative.	Support for Alternative C
Mincey, Sarah	If the Forest Service chooses a logging alternative, I strongly encourage you to approve Alternative B, the "Minimal road work" alternative over the Alternative A, the "Modified proposed action."	Support for Alternative B

Author(s)	Comment	Response
Mincey, Sarah	If the Forest Service can meet its goals without adding system roads, with reduced landing footprints, and absent the impacts of temporary road construction, then the Forest Service should opt to do so. This is particularly relevant given that the existing roads in the forest are not maintained adequately.	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.
Mitchell, Anne	My objection to this plan continues to be the introduction of "new populations of trees" also invites non-native species, which are already overwhelming many of the areas where we hike in Kentucky.	The effects of the project on non-native invasive plants is disclosed on page 4-33.
Mitchell, Anne	The sorts of commercial ventures in our forests are counterproductive. They harm a resource that many people use - the forests - and that can't be duplicated in other ways. It's not a selective harvest to prevent fire, etc. It's commercial harvesting with a broad, negative impact.	Support for Alternative C

Author(s)	Comment	Response
Mudd, Martin	<p>I am writing in support of Kentucky Heartwood's position on proposed commercial timber harvest in Beaver Creek Watershed.</p> <p>I hunt, fish, camp, hike, and generally commune with Nature regularly throughout different sections of the Daniel Boone NF. The effects of commercial logging are all too familiar: superfluous roads, damaged ecological communities, interrupted succession, invasive species, overgrown forest floor, etc.</p> <p>I prefer no commercial logging on our national forests, and if that is not an option, then Alternative B would limit the damage.</p>	Support for Alternative B
Nickell, David	<p>No action is, in my experience, the best alternative when Forest Planners are looking to justify their job titles. Given the options, I agree with Kentucky Heartwood that Alternative B is the least harmful (NOT the "better") of the options you provide.</p>	Support for Alternative B
Nickell, David	<p>While I strongly oppose commercial harvest on public lands in general, leaving the forest alone is not one of the alternatives the public has been given.</p>	Support for Alternative C
Scheff, Jim	<p>As we have previously expressed, we do not think that harvesting timber in this watershed is necessary nor the best course of action.</p>	Support for Alternative C

Author(s)	Comment	Response
Scheff, Jim	While we do believe that the Forest Service should be engaging in management activities in this watershed and analysis area, we are of the opinion that the priorities for the area should focus on remediating previously harvested stands, treating non-native invasive plants, addressing road maintenance and erosion issues, and ensuring an adequate and sustainable trail system.	These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.
Scheff, Jim	Given the options presented in the EA, we urge you to choose Alternative C, the "No action" alternative.	Support for Alternative C
Scheff, Jim	If the Forest Service chooses a logging alternative, we strongly encourage you to approve Alternative B, the "Minimal road work" alternative over the Alternative A, the "Modified proposed action." If the Forest Service can meet its goals without adding system roads, with reduced landing footprints, and absent the impacts of temporary road construction, then the Forest Service should opt to do so.	Support for Alternative B
Scheff, Jim	Not a relevant issue as the appropriateness of timber harvest on National Forest System Land has been decided by law and regulation. (EA 1-9) 2	Development and consideration of a range of alternatives is disclosed Chapter 2 of the EA.
Scheff, Jim	<p>We find it inappropriate for the Forest Service to dismiss, wholesale, public concerns regarding the appropriateness of timber sales on national forests. Are the only concerns worth considering where and how to log, and not whether to log? What of the "No action" alternative?</p> <p>In the discussion of alternatives considered but eliminated from study, the Forest Service makes a statement that directly conflicts with conditions on the ground. The EA states (EA 2-1):</p> <p>2.4 Alternatives considered and eliminated from detailed study</p>	These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.

Author(s)	Comment	Response
	<p>The following alternative was considered but will not be studied in detail due to the factors listed.</p>	
	<p>? Cutting of trees in previously harvested areas due to lack of trees of desirable species or form to create the desired forest structure. This alternative will not be considered further since there are no previously harvested areas in the project area that are not progressing toward the desired forest structure due to species composition or form. (emphasis added)</p>	
	<p>As addressed extensively in our scoping comments, adjacent stands harvested in the early 1990's are dominated by tulip poplar and multi-stemmed stump-sprouted (coppice) red maples. These conditions are predominant in the area, and your staff must of have observed these conditions. And these conditions, objectively, do not represent "the desired forest structure due to species composition or form" as defined by the Forest Plan and various DBNF projects designed to mitigate these very conditions. We are including several photos from multiple stands in the project area, each of which is adjacent to proposed harvest units. Is it fair to say now that these coppiced red maple forests represent the Forest Service's "desired forest structure" in terms of species composition and form? 3 4</p>	
	<p>Contrary to the statement that these stands are "progressing to the desired forest structure," the DBNF has affirmed that forests in this condition are in fact not desirable, and has allocated funds to manage and rehabilitate some of these stands across the forest. For example, the February 6, 2012 scoping letter for the London Pre-Commercial Thinning Project states:</p>	

Author(s)	Comment	Response
	<p>"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."</p>	
	<p>The conditions represented in the previously harvested stands in the project area are objectively contrary to the above description of desirable species composition and form in young stands.</p>	
	<p>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 5</p>	
	<p>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.</p>	
	<p>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 harvest-induced maple-dominated condition goes against the direction in the Forest Plan. The Desired Future Condition for 1.K states:</p>	

Author(s)	Comment	Response
	<p>"The desired diversity includes major plant communities such as mixed mesophytic, upland oak and yellow pine forests, which include American chestnut,"</p>	
	<p>And</p>	
	<p>"Oak and other hardwood regeneration is present across the prescription area."</p>	
	<p>This is not what is happening in these stands.</p>	
	<p>Under the Prescription Area Community Descriptions for Two-aged or Even-aged Young Forest, the Forest Plan states:</p>	
	<p>"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."</p>	
	<p>The forest types represented by these stands were "upland oak, yellow pine and ore mixed oak and yellow pine forest types," but are no longer.</p>	
	<p>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, which didn't happen.</p>	

Author(s)	Comment	Response
	<p>Furthermore, Forestwide Standard DB-VEG-24 states that:</p> <p>"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." 6</p> <p>Clearly, the referenced stands did not reach adequate stocking of desirable species within 5 years of the final cut. And you cannot just state that they did when the evidence is to the contrary. The Forest Service has routinely made clear the position that red maple is not a desirable species to have dominant in upland oak forests. The DBNF 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.</p> <p>We appreciate that the Forest Service has proposed to follow up 10 years post-harvest with a crop tree release. This should help with long-term oak dominance in newly harvested stands. However, it does not mean that the previously harvested stands are in good condition.</p>	

Author(s)	Comment	Response
Scheff, Jim	<p>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," this is not in the Purpose and Need for the project, and 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.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
Scheff, Jim	<p>The Forest Service should not approve the construction of any new system or "temporary" roads (the latter of which are anything but temporary). If the Forest Service does approve logging in these watersheds, then the Forest Service should choose Alternative B, the minimal road work alternative.</p> <p>With regard to "temporary roads," we point to the following pictures taken of "temporary roads" constructed to remove timber as part of the Ice Storm Recovery Project on the Cumberland District. The first image shows invasive Japanese</p>	

Author(s)	Comment	Response
	<p>stiltgrass (<i>Microstegium vimineum</i>) infesting a "temporary road" and extending well into the forest. The second image shows a "temporary road" choked with orchard grass. If the Cumberland District has been unable thus far to manage "temporary roads" in a manner that does not turn them into bulldozed benches choked with invasive species, then the district should not be approving the construction any more such features. 7</p> <p>With regards to new system road construction, Kentucky Heartwood raised concerns in our scoping comments regarding the wisdom of constructing new, unneeded system roads at a time when the Forest Service is unable to maintain existing roads to standard. While we appreciate that the Forest Service has developed a minimal road work alternative for the analysis, it does not appear that the agency truly grasps the issues at hand. The EA responds to our concerns over adding to the road and infrastructure maintenance backlog in section 1.4.1 Issues and Indicators (EA 1-9) by stating:</p> <p>7. Construction of an additional 0.9 mile of roads will add to the maintenance backlog of roads on National Forest System land causing the roads to be inadequately maintained once they are built.</p> <p>Response: This issue is conjectural as the new road construction should not add to maintenance costs as the purchaser of the timber to be harvested will be responsible for constructing and maintaining the roads during the project. Following the project the roads will be placed on low level maintenance for administrative use only.</p>	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.

Author(s)	Comment	Response
	<p>Our concerns here are not conjectural, as demonstrated both by other statements in the EA and statements made by the U.S. Forest Service with regards to forest roads nationwide. 8</p>	
	<p>The EA states at EA 3-12:</p>	
	<p>Roads: There are approximately 248 miles of roads within the three watersheds in the affected area. 108 miles of road are National Forest System roads (NFSR). The remainder is a mixture of federal, state, county, private roads.</p>	
	<p>Of the miles of NFSR within the watershed eleven (11) miles are open to public use, twenty (20) miles are used for Forest Service project access with occasional public use, and thirteen (13) are closed to all uses unless opened for project work. The majority of NFSRs in the watershed are not being maintained to their designated standards. (emphasis added)</p>	
	<p>We also note that the above statement provides the status 44 miles of NFS roads, while also stating that there are 108 miles of NFS roads in the project area watersheds. What is the status of the remaining 64 miles of NFS roads?</p>	
	<p>The EA further states at EA 3-23 that:</p>	
	<p>Current recreational use of the project that relies upon motorized access to areas is currently hindered in many areas due to the current condition of the road system. (emphasis added)</p>	
	<p>How can the Forest Service acknowledge that "the majority of NFSRs in the watershed are not being maintained to their designated standards," and that recreational use is "currently</p>	

Author(s)	Comment	Response
Scheff, Jim	<p>hindered in many areas due to the current condition of the road system," but then argue that concerns regarding long-term maintenance of newly constructed system roads are merely "conjectural?"</p> <p>Further, the issues of inadequate resources to maintain roads are not limited to the Daniel Boone NF. The U.S. Forest Service Road Management Website states:</p> <p>"Current funding is inadequate to manage the forest road system. Less than 20 percent of forest roads are fully maintained to planned safety and environmental standards. The backlog of reconstruction on forest roads is estimated to be more than \$8.4 billion due to inadequate regular maintenance. Projections indicate that at existing funding levels, the entire road network will be in overall poor condition by 2020."¹</p> <p>¹ http://www.fs.fed.us/eng/road_mgt/overview.shtml (accessed August 16, 2016)</p> <p>According to the President's 2015 budget, national annual road appropriations for Forest Service Roads decreased 7% between 2013 and 2015, and operations and maintenance allocations decreased by 10%. This follows a long trend of declining funding for forest roads. The Forest Service has reduced the total number of road miles in the national forests by approximately 7,000 miles over the last 10 years (USDA Forest Service, 2014). The 2015 budget funded maintenance for only 9,200 out of 204,600 miles of high clearance and 102,000 miles of closed roads. (USDA Forest Service, 2014). As of 2003, the road maintenance backlog nationwide for the USFS was more than \$10 billion (USDA Forest Service, 2003).</p>	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.

Author(s)	Comment	Response
	<p>9</p> <p>Again, the Forest Service should not dismiss these concerns as conjectural.</p> <p>4. Sedimentation Offsets</p> <p>The EA cites restoration projects, specifically road and OHV trail closures, as offsetting the anticipated increases in sediment resulting from this project. Section 4.1.3.1 Stream sedimentation (EA 4-6) states:</p> <p>In the affected watersheds, the cumulative percent stream sediment increases over current conditions are estimated to be less than two percent. These changes are often offset by other restoration projects in the watersheds (i.e., road and OHV trail closures).</p> <p>Please provide information on what specific road and OHV closures are taking place in the affected watersheds. The only road work we are aware of is road construction associated with the project. If there is no such work planned in this project area then the EA should not include statements suggesting that the Forest Service is mitigating these impacts through other actions.</p>	

Author(s)	Comment	Response
Scheff, Jim	<p>Under Environmental Consequences section 4.5.2 Plant species, the EA asserts that temporary road construction could benefit running buffalo clover (<i>Trifolium stoloniferum</i>). The EA states (EA 4-17):</p> <p>Running Buffalo Clover would be the species 2most likely to benefit from some ground disturbance and may be more likely to establish a new population at the site of a temporary road where disturbance occurs but then is eliminated or kept minimal post project.</p> <p>While moderate soil disturbance can promote this species, it is not found near the project area or in either county represented by the project (Bath and Meniffee) and would not be affected. The EA then asserts that an undesirable consequence of Alternative B, the minimal road construction alternative, is that habitat for running buffalo clover would not be created:</p> <p>Any possible benefits to Running Buffalo Clover, which responds positively to some ground disturbance, would not occur. (EA 4-18)</p> <p>It is very misleading to suggest a negative consequence of not building roads based on the virtual impossibility of a rare and endangered plant species becoming established in a county where it is not documented. At best this is padding of the analysis and should be removed</p>	Effects to running buffalo clover is found on page 4-16.
Scheff, Jim	<p>The scope of the cumulative effects analysis is supposed to include a consideration of activities on nearby and adjacent private land. 40 CFR §1508.7 defines cumulative impacts as follows:</p>	

Author(s)	Comment	Response
	<p>§1508.7 Cumulative impact.</p> <p>"Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (emphasis added)</p> <p>In the describing the Affected Environment in section 3.2.8 Land use including prime farmland, timber, and rangeland (EA 3-11), the EA properly (and helpfully) provides information in Table 3.2.8-1 showing land cover type distributions in the affected watersheds, including both private and overall ownership. However, the EA fails to extend this same scope of consideration to logging activities that could help meet the purpose and need for the project.</p> <p>Below is an image captured from Google Earth (accessed July 2016) showing about 150 acres of private forest recently harvested in the Brier Branch tributary of Beaver Creek, less than 1 mile from the proposed Kendrick Ridge harvest units. Forest Plan 1.K-Objective 1.A. provides that the Forest Service should "Maintain 5 to 6 percent forest cover within each 5th level watershed in the 0-10 age class." This Objective calls for consideration at the watershed level, and does not distinguish between private and federal forest lands. If this objective is being met through harvests on private land, then there may be little need for also increasing the 0-10 age class on federal forest lands in the analysis area. The Forest Service needs to take a "hard look" at this in the cumulative effects analysis.</p>	<p>The purpose and need for young forest was derived from the Forest Plan and the amount needed is related and linked to the NFS lands included in the 1K (Habitat Diversity) prescription area. The amounts needed were determined by the analysis associated with the Forest Plan that includes estimates of harvest on nearby private lands. That analysis concluded that based upon those estimates there was still a need for 3 to 5 percent of this type of forest to be provided on NFS land in each watershed.</p>

Author(s)	Comment	Response
Scheff, Jim	<p>We requested in our scoping comments that the Forest Service present a clear and comprehensive accounting of all costs and projected revenues. While all accounting methods make certain assumptions, we question the net revenue numbers provided in the EA. The EA estimates net revenue from the logging alternatives ranging from \$162,343 (Alternative B) to \$209,173 (Proposed Action). This runs contrary to the well-accepted understanding the costs of analyzing and administering timber sales on national forests nearly always exceed revenue.</p> <p>The EA estimates planning costs at \$30,000 for Alternative B, and \$50,000 for the Proposed Action and Alternative A. We presume that the additional costs for the Proposed Action and Alternative A are related to road construction. This project has seen two scoping periods, multiple public meetings, archeological surveys, biological surveys, timber resource surveys, preparation of the EA, and likely many hours of internal meetings. It is difficult to imagine that the combined personnel hours involved in this process (excluding the additional road work costs) come to only \$30,000.</p> <p>To be clear, we do not believe that land management should necessarily produce any net revenue. Managing the forest takes resources. But we also do not think that costs should be left out of the ledger, presenting a skewed net revenue forecast for public and administrative review and, ultimately, making an informed decision.</p>	Financial data is found in the EA on pages 2-3 and 4-35 to 4-36.

Author(s)	Comment	Response
Scheff, Jim	<p>We appreciate that the Forest Service has included treatment for non-native invasive plant (NNIP) species in to the Modified Proposed Action and Alternative B. While we do not think that the proposed treatments for NNIPs will necessarily mitigate all spread caused by the timber harvest, we hope that it will at least limit the impacts. Pretreatment, careful monitoring, and follow-up treatments will all be necessary for a good outcome.</p> <p>We are still particularly concerned with invasive species infestations along access roads and through the powerline right of way associated with stands 1095-30 and 1095-26. We discussed these particularly concerning infestations in some detail in our scoping comments. These stands need to be carefully assessed.</p> <p>With regard to equipment cleaning associated with harvest (4.6.6 Non-native invasive plants, EA 4-32), we would like some reassurances that this will actually happen. It has come to our attention that application of this standard has been inconsistent on the forest.</p>	<p>The effects of the project on non-native invasive plants is disclosed on page 4-33.</p>
Shaw, Courtney	<p>We urge the Forest Service to look much more carefully at the long-term ecological damage to the forests that logging our causes, as well as introducing invasive species and damaging our valuable interior forest habitats</p>	<p>Effects related to invasive species is found on page 4-33 of the EA.</p>
Shaw, Courtney	<p>IF AN AREA IS LOGGED, the Forest Service has an OBLIGATION to the American people to return these logged areas to something close to their natural state by ensuring the planting of native trees and plants that can help jump-start the forest's return to its natural state.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>

Author(s)	Comment	Response
Shaw, Courtney	In this light, we much prefer the Modified Proposed Action, which includes replanting native plums, persimmons, dogwoods and other native tree and plant species; as well as NOT using chemical means of plant control, instead using manual and mechanical removal techniques to mitigate ecological damage from chemical herbicides and to halt the spread of invasive species' moving into these logged areas.	Support for Alternative A
Shaw, Courtney	We also much prefer "Alternative B," which creates much less roadway into the forest. Building roads through forests and mountains leads directly to soil erosion, especially when combined with logging. When trees are removed, their roots cannot hold the soil in place to prevent erosion, and when roads are added on top of that, soil erosion is drastically worsened.	Support for Alternative B
Shaw, Courtney	On top of soil degradation and erosion caused by introducing roadways to the forest, the budget of the Forest Service is not adequate to ensure that the many already existing roadways in our forests are properly maintained. So why would adding more roadways, that will not be adequately maintained, be helpful? It would help the logging company take our trees away more quickly and economically for them, but it does nothing useful for the American public. All it does is add to the degradation of these sites, and add yet another monetary burden to the Forest Service (and by extension, the American taxpayers).	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.

Author(s)	Comment	Response
Shaw, Courtney	<p>Our concerns about logging in the Daniel Boone Forest began when we saw the massive degradation of previously-logged sites in the area. Sites that were logged in the 1980s-1990s have not been followed up to ensure that the forest as we knew it survived. These sites, which once were full of majestic Oaks, Hickories, and Pines, are now unhealthy multi-stemmed Red maples, grapevines, and tulip poplar. These sites have NOT been properly managed for the health of our beautiful National Forest. Our concern is that more logging will create just more of the same loss of our precious Oak-Hickory and Oak-Pine forest ecologies.</p>	<p>These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.</p>
Smith, Chris	<p>I am writing to express my opposition to the proposed Commercial Timber Harvest in the Beaver Creek Watershed.</p>	<p>Support for Alternative C</p>
Smith, Chris	<p>While I fully understand that the mixed-use mandate of the Forest Plan allows and seems to demand the commercial sale of timber from our National Forests I am concerned about the disregard of overwhelming public opinion about logging on public lands. While the Daniel Boone National Forest consistently is unable to meet mandates for recreational improvements, ill-conceived and costly timber sales are repeatedly proposed. I feel that my tax dollars are being misallocated to prop up the economic interests of a select few, while the impacts on local residents and recreational users, which represent a far larger percentage of the population impacted by issues on the DBNF, are consistently disregarded.</p>	<p>Financial effects are included in the EA on pages 2-3 in Table 2.5-1, 4-13 in Table 4.4-1, and 4-36 in Table 4.9.1-1.</p>

Author(s)	Comment	Response
Smith, Chris	I also have specific concerns about the language used in proposal of this sale. Suggesting that commercial logging in the Cumberland District is necessary to "mimic disturbance patterns from the past," ignores the very recent history of natural disturbance from the 2003 ice storm and the salvage logging that followed. The Forest Service seems to assume that a disengaged public will not recognize the inherent contradiction whereby natural disturbance on 4000 acres requires logging to ameliorate, while neighboring mature forest requires disturbance by logging for habitat creation.	
Smith, Chris	Similarly, stating that proposed road building could result in conditions suitable for the proliferation of running buffalo clover ignores the fact that the species is not documented in either of the counties of the project area and is extremely difficult to establish in the absence of large hoofed ruminants.	Effects to running buffalo clover is found on page 4-16.
Smith, Chris	These examples illustrate what appears to be a management plan that proposes timber sales first then seeks ecological sounding rationalizations that bear little relationship to the actual landscape.	The purpose and need for the project is disclosed on 1-2 of the EA.
Smith, Chris	As an avid recreational user of public lands, I have a love for and interest in the ecological biodiversity of the Pottsville Escarpment region. I urge you to reconsider the proposed timber sale and use the funds allocated for its implementation for the improvement of the stands of multi-stemmed, stump sprouted red maple, tulip polar, and grapevine that are the result of logging projects in the mid 1990s that were remarkably similar to the current commercial harvest proposal.	These comments are identical to statements provided during the re-scoping period for this project. The Forest Service considered and responded to these concerns during the re-scoping effort earlier in the year. The response to these concerns can be found on page 5 of the 'Public involvement comments and responses' document found in the project record and Forest webpage.

Author(s)	Comment	Response
Trimboli, Todd	As this is not a coldwater stream and we are certain Forest Service Best Management Practices will be applied to the logging operation, we have no concerns with its implementation.	
Trimboli, Todd	However, we would request that Wood Duck Nesting Boxes be placed in Wetland Areas within the Beaver Creek Watershed (possibly as mitigation), where they would be deemed appropriate by the Cumberland Ranger District Wildlife Biologist.	
Vail, Thorne	What a shame that the Forest Service is again proposing to log another part of the Daniel Boone National Forest.	Support for Alternative C
Vail, Thorne	Hasn't the forest service taken and sold enough of our timber. This land should be protected from such destructive practices so that all tax paying Americans will be able to enjoy these wooded lands for many generations.	Support for Alternative C
Vail, Thorne	Not only will logging destroy habitat for the many species living there but it also opens up the area to invasive plant species that will be difficult to control.	The effects of the project on non-native invasive plants is disclosed on page 4-33.
Vail, Thorne	A proposed access road will be bulldozed in which will destroy many native plants and the road will remain for many years as further evidence of the forest service's disregard to regeneration of the indigenous plants and small animals.	<ul style="list-style-type: none"> • Area of new road construction (temporary and system): This is addressed in the EA on page 2-3 in Table 2.5-1 and on page 4-2 in Table 4.1.2-1. • Effects to road maintenance costs: This is addressed in the EA on page 4-12 and 4-13. • NNIPS and the road system: This is addressed in the EA on pages 2-1, 3-24, and 4-33. • Effects of road construction on plants and wildlife: This is addressed on pages 4-13 to 4-33.

Author(s)	Comment	Response
Vail, Thorne	<p>So much destruction to enrich the wallets of a few at the detriment to all. Can't you have mercy and protect the flora and fauna living in this national forest that benefits us all. A moratorium must be issued to stop the logging in our national forests.</p> <p>May God have mercy on the despoilers of our environment.</p>	Support for Alternative C
White, Ray	<p>I strongly support this proposal and the US Forest Service becoming more pro-active in timber management as set forth by the original charter of the US Forest and the current Beaver Creek Watershed Harvest.</p>	General expressions of support for active management of the National Forest
White, Ray	<p>With the lack of any subtenant forest management over the past 16 years; we are seeing a direct negative affect of forest health and a dynamic shift of forest species to non-native species taking over the Native Oak Forests of US. These forests have been manipulated for thousands of years by the native Americans and the US as we became a sovereign nation some 200 years ago. Without forest products expansion; this great country would have been nearly impossible.</p> <p>My deep concern that sales such as the proposed must be commenced with even more fervor than a couple sales. We have lost much of our native mammal and bird habitat because of the no hands approach being forced upon our stewards; the U.S. Forest Service. Enter any national forest and attempt to locate grouse, pheasant, and small mammals that were so abundant 16 years ago. They are mostly gone now. This is a direct result of not allowing proactive even age harvesting, selective harvesting, and in some circumstances limited clear cuts. Salvage logging is not the answer!</p>	General expressions of support for active management of the National Forest

Response to Comment (By Comment Author)

Author(s)	Comment	Response
White, Ray	With the mature forest stands across our forests; we have lost vital understory which served a very important cover and habitat for many ground species. The bigger concern is by not managing the forest we are seeing a dynamic shift to non-native species which do not have the capacity to produce forage for our current habitat. This already has had a dangerous effect of our eastern deciduous forests.	General expressions of support for active management of the National Forest
White, Ray	I suggest reading a very comprehensive study done by Princeton University in 1998 addressing carbon sequestration. Their conclusion with this non biased study revealed that active forest harvesting was allowing the young eastern deciduous forest to uptake carbon dioxide at a much faster rate thus cleaner air and water supplies. The mature forest now need to be harvested to allow the younger stands to take over the forest canopies. The benefits are priceless. Trees have a mortality and we are doing a disservice to our forests and our country by not allowing un-objected harvesting of stands that are way over do for cutting. It is a sad thing to see large trees blown over rotting; whereas they could be used for wood products and carbon storage.	General expressions of support for active management of the National Forest

Response to Comment (By Comment Author)

Author(s)	Comment	Response
White, Ray	Another terrible side effect; is the massive forest fires taking place across all of our forests. This can be linked again to non-manipulation of healthy forest management. Because of this real threat much of the budget of the forest service is now consumed by forest fire control. Another disservice is the large amount of money that has been lost to our local school systems once so dependent upon forest sales. We could almost eliminate the budget shortfall of our education system by opening our forest back up to harvest allowing much of the timber proceeds to refund our schools.	General expressions of support for active management of the National Forest

Author(s)	Comment	Response
White, Ray	<p>We need to allow the Forest Service to do their jobs using sound science and not fear mongering by preservation groups. Their well-intentioned ideas are wrong and are causing disease and loss of many habitats. If we do not allow our forest service to operate as they were chartered we will lose the current forest over this next generation. As an industry professional whose life is committed to sustainable harvest and wood activities; I see catastrophic consequences that are taking place now and will be very hard to correct unless we allow new harvesting and on a widespread approach now. Time is against us. We are to blame for allowing so much red tape and lawsuits to stop active forest management. Our children and grandchildren will suffer do to our neglect and interference of the proper trained authorities to do their job. Please allow this sale and other to proceed without interruption and time consuming lawsuits. Again please read the original charter of the National Forest Service. It is clear that timber management was and is a vital goal for the very existence of setting these forest up. The decisions that we have allowed to interfere have caused major and possibly irreversible damage to our Oak Forest and the wildlife that is so dependent on them. There are so many positive attributes to sound forest harvesting that no one with proper education could ever argue with any merit to continue to keep our forest stewards from doing their jobs. I implore those in decision making to make a strong stand to allow these harvests to proceed immediately.</p>	<p>General expressions of support for active management of the National Forest</p>

Author(s)	Comment	Response
White, Ray	<p>I cannot stress enough that this and all national forests were chartered for many uses including future forest timber supply. There must be common sense approach before we lose our vital forest which is definitely occurring now. My family has spent more than 4 generations in the forest providing wood products and we consider ourselves experts in what is best for long term healthy forests. The current criteria has failed miserably due to small groups of fear mongering. Science is on our side; let's use it!</p>	<p>General expressions of support for active management of the National Forest</p>
White, Ray	<p>Please allow these sales to proceed unabated and return authority to allow our stewards of our forests to do their jobs. I implore you to take action now. Please do not allow misguided groups to stop much needed harvests. Harvests that are legally allowed by the charter of our national forests. Timber is our only natural renewable resource in the world. Please allow sound science to prevail and not emotions. Please allow Commercial Timber Harvest in the Beaver Creek Watershed to proceed without delay. Not allowing this sale to proceed will have dire consequences.</p>	<p>General expressions of support for active management of the National Forest</p>
White, Ray	<p>To continue to not allow timber harvesting can and should be challenged as a direct violation of the initial purpose for chartering these national forests in the first place. Congress should take a very close look at this terrible travesty taking place.</p>	<p>General expressions of support for active management of the National Forest</p>
Wiles, Micah	<p>As someone who uses the Daniel Boone National Forest for recreation, I am against the proposed timber harvest in the Beaver Creek watershed.</p>	<p>Support for Alternative C</p>