

Mr. Timothy E. Jones
Big Piney Ranger District
12000 SR27
Hector, AR72843

Re: Roberts Gap Project, #53597

August 24, 2020

Dear Mr. Jones,

The Ozark Society, representing 1,000 members would like to make the following comments about the Roberts Gap Project. Please include them in the record. Thank you for the opportunity to make these recommendations.

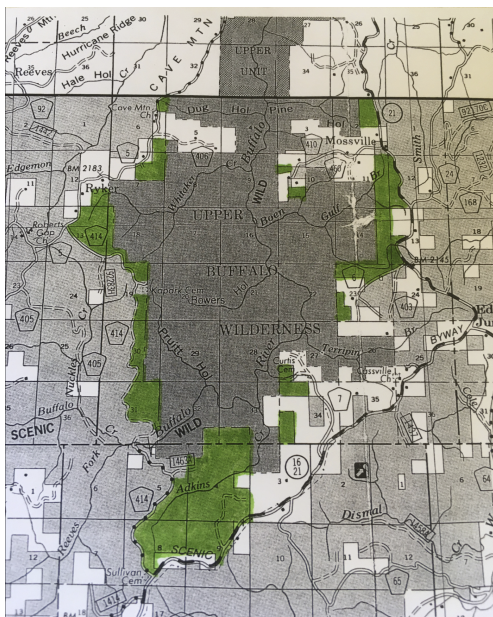
As a way of making recommendations we will separate our comments according to several issues.

1. Potential Wilderness Additions to the Upper Buffalo Wilderness

There are approximately 3000 acres (all Forest Service land) in several tracts, that have been identified as having the potential to be considered for wilderness designation as additions to the existing Upper Buffalo Wilderness Area at some point in the future. As potential wilderness, it is important that these lands be protected now so they will better retain their natural characteristics over time so they can later be considered for wilderness. The map below shows these potential additions marked in green.

Our recommendation is that the Forest Service not plan any new road building, timber, or forest and wildlife management activities in the lands.

Alternative 3 does show management activities planned for portions of the green area marked on the map for protection. The following is a list of compartments and activities



proposed in Alternative 3 that we recommend that the Forest Service not include in the Roberts Gap Project.

Comp. 56, Hardwood Thinning; Comp. 57, Pine Thinning; Comp. 58, Hardwood Shelterwood; Comp. 166, Hardwood Thinning; Comp. 161, Hardwood Thinning; Comp. 159, Hardwood Shelterwood (the portion north and east of Road 414); Comp. 158, Pine Thinning; Comp.157, Hardwood Thinning; Comp. 86, Hardwood Thinning (the portion east of Road 414); Comp. 85, Hardwood Thinning; Comp. 84, Hardwood Thinning (the portion east of Road 414); Comp. 83, Pine Thinning (the portion east of Road 414); Comp. 79, TSI; Comp. 70, Hardwood Thinning; Comp. 71, Hardwood Shelterwood; Comp. 72, Pine Thinning (the portion on the east side of Dixon Ford Road); Comp. 78, Pine Thinning (the portion on the east side of Dixon Ford

Road; Comp. 61, Pine Thinning; Comp. 62, Hardwood Thinning; Comp. 63, Hardwood Shelterwood; Comp. 64, Hardwood Thinning (the portion north and west of Road NE9050); Comp. 65, Pine Thinning (the portion north and west of Road NE 9050; Comp. 69, Manual Release; and Comp. 66, Pine Thinning.

2. Protection of the Buffalo River, the Kings River, and Their Tributaries

As it flows through this Robert's Gap Project area, the Buffalo River is largely fed by water falling on the lands of the Ozark National Forest. Forest Service management of these lands is important to make sure that water quality and native aquatic species are protected. We support efforts by the Forest Service to protect the water quality and native species in the Buffalo and its tributaries by closing roads when appropriate to reduce erosion, by minimizing the extent of timber cutting operations, and by making sure that highway vehicle use, OHV use, horse use, bike use, hiking use, or camping use are not damaging the Buffalo or its feeder streams.

The land in this project that lies in the Kings River watershed should also be managed in ways that protect the water quality and ecological integrity of the Kings and all of its tributaries.

When approving any projects on any Forest Service lands, we support keeping water quality considerations, and the well-being of native species that inhabit these streams, right at the top of your list.

3. Roads

We support keeping roads to a minimum throughout the project area. We support decommissioning the roads in your plans in Alternative 3. We support fewer roads in the project area in order to decrease erosion, provide wild, undisturbed places for wildlife such as bears and bobcats, and to provide opportunities for human use and enjoyment of the forest away from the noise of motor vehicles.

When looking at Alternative 3, it appears that there will be new road construction associated with timber management activities or motorized recreational activities. It also appears that at least some of these roads (several are labeled PHM on the Alternative 3 map) are proposed to be kept open after the timber, wildlife, or recreation projects are completed. We recommend that all roads associated with this project be closed after any timber sales and that no new permanent roads be built in the project area. Closing these roads will help keep existing unroaded portions of the project area wild and unroaded into the future to maintain water quality, undisturbed, old forest wildlife habitats, and non-motorized recreation opportunities.

4. OHV Use

In the past decade or so, there has been a substantial increase in OHV trails on the Ozark National Forest. Although we recognize that this will be one of the uses of the Ozark National Forest, and some Ozark Society members enjoy OHV travel, it seems that OHV use on the Ozark

National Forest has increased to the point that it is changing the traditional wild character of this national forest, eliminating the opportunity for other recreational uses, and impacting wildlife habitats and water quality in certain areas.

Up until now, the Roberts Gap Project area has been largely free of designated OHV trails. However, OHV use appears to be allowed on the existing road system. We recommend that the Roberts Gap project area be kept free of any new OHV trails, that the Forest Service not allow increased OHV usage on existing or new roads in Alternative 3 or in your Final Plan for the Roberts Gap area. There are already plenty of OHV trails in other parts of the Ozark National Forest and more OHV use in the Upper Buffalo and Kings River Watersheds will further limit non-motorized recreational opportunities.

We encourage the Forest Service to make clear to the public, with abundant signage on the ground, which specific existing roads (of all levels), and trails are open for OHV use and which ones are not. Such signage should be used to delineate horse, bike, and hiking use trails as well so the general public will be able to reliably choose a recreational trail or road that suits them, without confusion about which trails are open for which use.

5. Bike Trails

In the Roberts Gap Project (Alternative 3), more than 15 miles of new bike trails have been proposed to be added to the approximately 35 miles of bike trails that already exist in the Upper Buffalo Bike Trail system in the Buffalo River Watershed upstream from the Upper Buffalo Wilderness Area. We recognize the legitimate use of some national forest land for bike trails and other types of trails, understand the increased popularity of mountain biking in Arkansas in recent years, and we have many members of the Ozark Society who are avid mountain bikers.

In general, the Ozark Society supports the idea that extensive bike trail systems (as well as horse trail systems and OHV trail systems) should be somewhat concentrated, and be of a certain density so as to not have a large overall footprint on the Ozark National Forest as a whole. However, there are some places on the Ozark National Forest that are better than others for these large-scale trail systems, each of which can occupy several square miles, and deter other recreational uses where they are located.

We are concerned that a large bike trail system where the new trails are proposed to be built will diminish the wild character of the area. This portion of the Buffalo River Watershed, where the Buffalo River has its origins, is valuable as a wild place of unbroken forest, pristine streams, and old forest wildlife habitats. This relatively undisturbed forest is full of a diversity of native plant and animal species and it filters the water that flows through the Upper Buffalo Wilderness and beyond to the Buffalo National River.

This place is now mostly wild. We believe it should remain wild, with very few roads or developments of any kind. Wild places like this are hard to find and can be easily lost unintentionally if we are not paying attention.

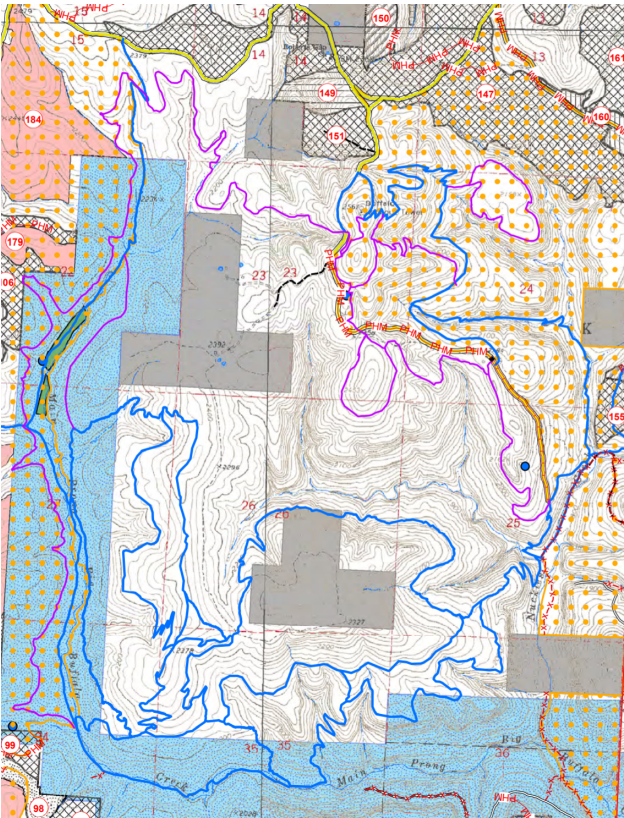
We recognize that there is a bike trail system of considerable size that is already there. We know that the existing bike trails will remain, and some trails will be deleted and some mileage added. But there is still a large portion of the total area in the Buffalo River Watershed,

upstream from Dixon Ford, that is still wild. We think it is important to keep it wild and to pass it on wild to future generations.

We are very concerned about this proposal to put another 15 miles of bike trails in an area we treasure for its wild, natural, and undisturbed characteristics. We appeal to the Forest Service and to the mountain biking community to work with us to see if we can find a way to have a quality mountain bike system here, and still maintain the wild portions of the area that do not presently have bike trails or other types of developments in them.

Though we would prefer to not have any additional trails here, we understand that a connector trail or two, bringing together the main parts of the existing bike trail system, would be desirable for many bikers, and would not significantly expand the overall footprint of the existing trail system. However, some of the other proposed trails, shown on the Alternative 3 Map, do expand into undeveloped wild places, and we recommend that these proposed trails be removed from the plan. Please consider the following proposed trails (in Alternative 3) for removal from the plan.

- 1) The proposed trail (marked in purple) starts by branching off the existing trail system, about a quarter mile south of the Cave Mountain Road Trailhead. It runs south along the west side of the Main Prong of Big Buffalo Creek for about 4 miles where it joins the existing trail system near the middle of Section 34.
- 2) The proposed trail (marked in purple) that extends beyond the northeast corner of the existing trail system to the northeast and forms a loop around a mountain top, which shows an elevation on the map of 2158.
- 3) The proposed trail (marked in purple) that extends south from the Buffalo Lookout Tower and forms a loop around a mountain top about a half mile due south of the Buffalo Lookout Tower, then extends south another quarter mile and forms another loop around a mountain top, with an elevation marked on the map of 2453. The trail continues to the east and southeast for another one and a half or two miles and joins the existing trail system within a quarter mile of Knuckles Creek, near the middle of Section 25.



6. Trail to Hawksbill Crag

The new National Park Service emphasis of upper river tourism and the probable increase in traffic from the Dog Patch redevelopment is expected to worsen the existing congestion problem at Hawksbill Crag. Expanded parking along Cave Mountain Road at the trailhead to Hawksbill Crag is needed for safety reasons and to reduce road congestion and irritation with local residents. The proposed changes to the existing trail to Hawksbill Crag would place all of the trail on Forest Service land and simplify and contain the hiking trail in the wilderness. We support these changes.

The proposed toilet facilities at the trailhead could alleviate current trailside bathroom usage which otherwise is sure to worsen, but might induce visitors to forestall bathroom usage until arriving at the trailhead thereby creating increased use. Properly maintained bathrooms are probably necessary.

In any case, post plenty of signs to give people good directions about how to use the Wilderness and the trail to Hawksbill Crag. This may be an opportunity to educate the public about what a Wilderness is and how to practice no trace behavior.

7. Timber Management

Alternative 3 has proposed timber management activities on some of lands that have potential as wilderness additions to the Upper Buffalo Wilderness. We recommend that no timber activities be done on these 3000 acres of potential wilderness lands, which are marked in green on the attached map.

Alternative 3 has proposed some timber management activities in the Edgemon Creek Watershed in an area that we have proposed for protection. These lands are marked in orange on an attached map. We recommend no timber activities be done in this area marked in orange on the attached map.

8. Fire

We recommend using prescribed fire as a tool to create low fuel buffer zones to serve as fire breaks at junctions between private land and the Upper Buffalo Wilderness. If a wildfire erupts in the Wilderness, the buffer zone will help give the private lands added protection (for lives and property). The buffer zone will help serve as a fire break by having less burnable dead material on the forest floor. It will also help protect the Wilderness from human caused fires that may originate on adjacent private lands. The buffer zones would be subjected to periodic controlled burns to keep low fuel conditions on the ground.

These buffer zones would be on Forest Service land rather than on the private land it joins. The appropriate width of the buffer may differ depending on the circumstances and topography of land with each wilderness/private land junction and can be determined by fire specialists, wilderness specialists, and the landowner involved.

If this approach works well with the Upper Buffalo Wilderness, it may be employed for other wilderness areas in Arkansas and elsewhere.

9. Wildlife and Biological Diversity

For this project area we recommend that the emphasis be for the protection of all native species of plants and animals, both game and non-game. Rare, threatened, and endangered species should be monitored and their habitats should be protected.

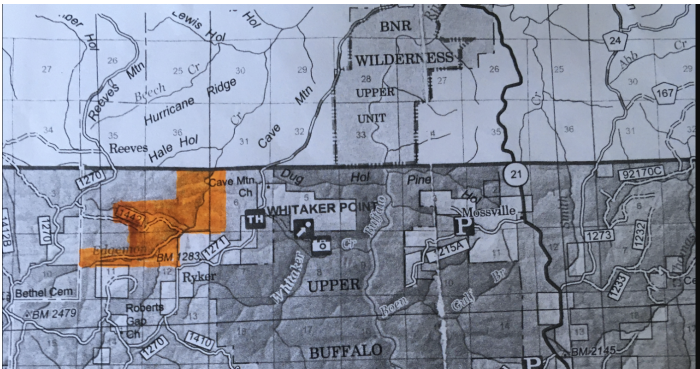
We recommend using extra caution to protect water quality by closing roads when appropriate, not building new roads, not cutting timber on steep slopes, and by making sure existing roads are not causing erosion. Siltation caused by erosion should be avoided to keep populations of fish, mussels, snails, aquatic insects that require high water quality, all healthy.

Avoid timber management in old forest ecological systems of mature canopy trees, den trees, downed logs, and snags which provide homes and food many species such as bears, foxes, wood ducks, woodpeckers, forest interior songbirds, and salamanders. Keep large unroaded areas of this type of habitat for wide ranging species such as bears and bobcats.

10. Hay Allotment

Although the hay land area under consideration is insignificant, we do not support continuing the hay allotment in the Kings River watershed. There are plenty of places to get hay from private lands in the area without dedicating National forest land to such a purpose.

11. Edgemon Creek Protected Area



We recommend that certain lands along near Edgemon Creek and its tributaries be given protection from timber management, wildlife management, road building, and trails, and be allowed to remain in a natural and undisturbed condition. This stream corridor has steep topography and offers a variety of specialized habitats for native plants and animals. Elevation

differences within the area are more than 500feet. It is also a tributary of the Buffalo River and such protection for this land will help assure good water quality and the health of aquatic species in Edgemon Creek and in the Buffalo River.

We recommend that these lands be removed from the timber base and given protection as a natural area for the course of this project and then in the updated Forest Plan Revision.

The area that we are recommending for protection is approximately 1120 acres in size. Much of this acreage is too steep and rugged to be practical for timber management. Protecting this area, shown on the attached map in orange marker, will require a change in Alternative 3 to not do any timber activities, road building activities, or wildlife activities in the area. Protection of this 1120 acres, will affect timber-related activities to different degrees in Compartments 37, 44, 45, 46, 47, 51, 52, 53, 54, 55, but most of timber management activities proposed in the Edgemon Creek watershed in Alternative 3, will not be affected by this 1120-acre protected area proposal.

We encourage the Forest Service to continue to protect this land where the Buffalo River starts, and to use planning opportunities and on-the-ground management to keep it wild and natural for generations to come.

12. Eagle Gap Special Interest Area (SIA) -

This area was originally recommended for protection by Dr. Neil Compton to protect wild azaleas and other plant species. Our recommendation is to not do the proposed timber thinning in this SIA as a part of this project. Instead we recommend that the management plan for this SIA be updated with on-site biological inventories and input from botanists and other biology specialists to see what kind of management will best protect the native species, especially the rare ones, that live there.

13.. Keeping the Upper Buffalo Watershed Wild and Natural

If there is a project area on the Ozark National Forest that should emphasize keeping the existing wild and natural character of the land, this is it. Management activities that are acceptable in other parts of the Ozark National Forest are not acceptable here. Up until recently The Buffalo River Watershed upstream from the Upper Buffalo Wilderness has been managed with a light hand by the Forest Service. Timber operations and developed recreation have been minimal and this area has been allowed to remain largely wild, unroaded, undeveloped, and natural.

14. A 1985 Recommendation for the Roberts Gap Project area from Dr. Neil Compton

In 1985, Dr. Neil Compton, a well-known advocate for a free-flowing Buffalo River and the Upper Buffalo River Wilderness Area, and the first president of the Ozark Society, made his recommendations for this Roberts Gap area in a letter in 1985. He wrote,

"The Buffalo River Headwaters - A westward extension of the Upper Buffalo Wilderness to protect the origin of the Buffalo River. This extension need not be managed as a legal wilderness, but further new roads should not be constructed and alterations of existing

ones kept to a minimum. Cattle ranching and chicken, turkey, and hog farms should not be encouraged. Selective timber cutting should be given preference over clearcutting.”

15. Summary

The Buffalo River has achieved special status as a wild, remarkably beautiful, free-flowing, clean, ecologically healthy, protected river here in Arkansas, and around the country. Due to the fact that a large portion of the Buffalo River Watershed is on the Ozark National Forest, it falls on the Forest Service to play a role in the fate of the Buffalo and its watershed in the present day and over time. When managing the Ozark National Forest, it seems that the origin of the Buffalo River is a good place to make sure we are doing things right.

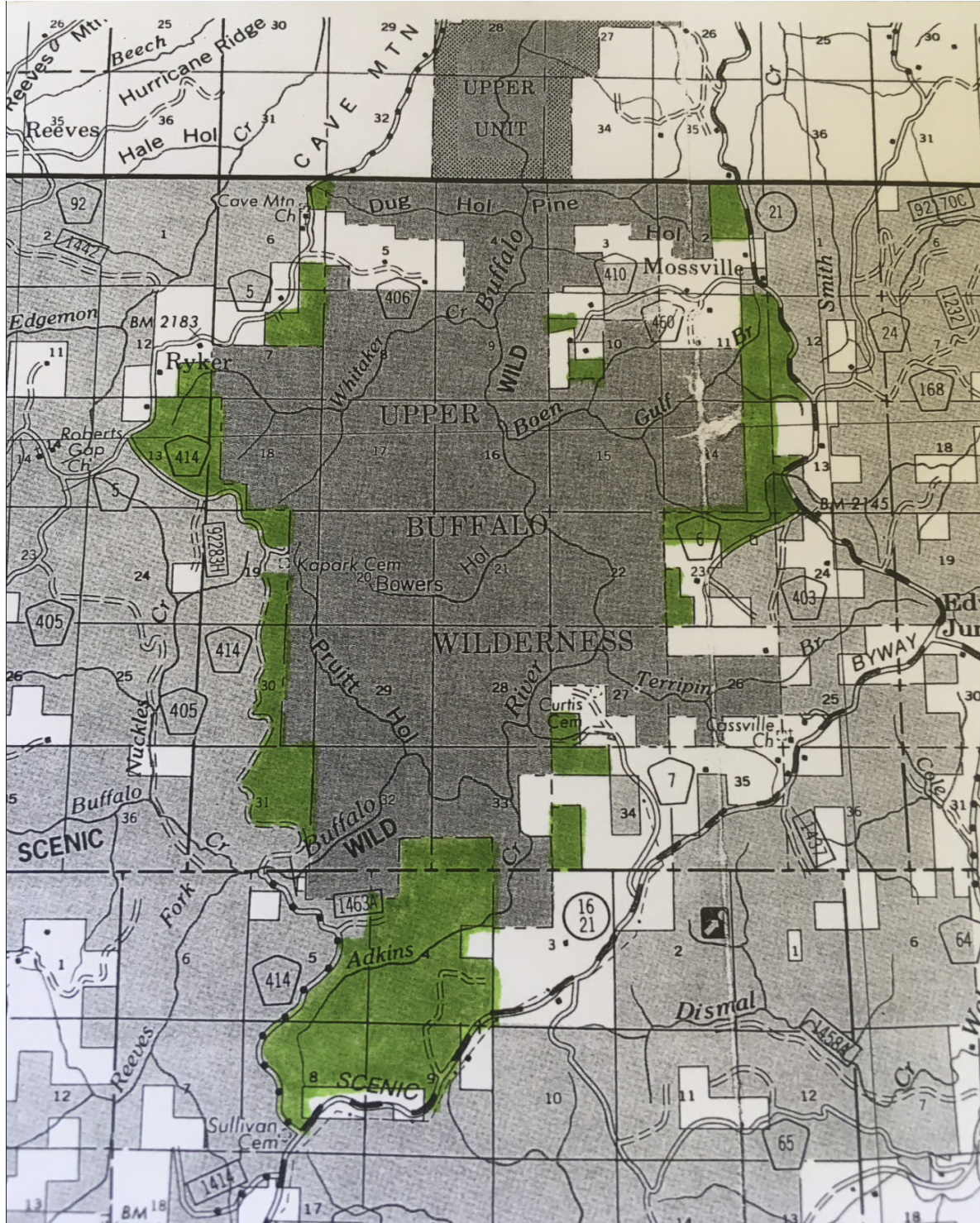
If the Buffalo River and its watershed, with its natural forests, streams, and wild areas are going to be here in good shape fifty years from now, we have to do things now that assure they will be. Incremental changes have a way of taking their toll. Species can easily be extirpated, streams can be degraded, and wild areas can be lost or fragmented.

What is it about the Roberts Gap Project area that is of great value? What is irreplaceable if we lose it? What is it that we want our grandchildren to be able to see, enjoy, and benefit from?

In these comments and attached maps, we have made some recommendations for the management of this project area that reflect some of our thinking about what is important. Thank you for considering them for incorporation in the final project plan.

Tom McClure, Ozark Society

David Peterson, President, Ozark Society



Proposed areas to protect for possible future wilderness in green