

BUFFALO RIVER WATERSHED ALLIANCE

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Tim Jones, District Ranger
US Forest Service
Ozark-St. Francis National Forest
Big Piney District
Re: Roberts Gap Project, #53597

September 1, 2020

Mr. Jones:

The Buffalo River Watershed Alliance, representing over 2,000 supporters, submits the following comments in response to the Robert's Gap Environmental Assessment. Thank you for the opportunity.

The Robert's Gap plan encompasses what is arguably one of the most ecologically sensitive areas of Arkansas. It includes the headwaters of the nearby Buffalo National River, designated in this plan area as a Wild and Scenic River, as well as the headwaters of the Kings River, an Extraordinary Resource Water. Both are among our state's most pristine streams. In addition, the Upper Buffalo Wilderness Area falls within the plan area. The plan area is characterized as having steep slopes and erodible soils atop karst topography. While the proposed activities are mostly conducted outside of these special protected areas (with the exception of hardwood thinning and burning adjacent to the King's River and prescribed burning across the Buffalo River), these areas will nevertheless be impacted, particularly in terms of reduced water quality, to the extent that an Environmental Impact Statement is warranted. Some of these impacts are addressed in detail below.

1. Roads

Alternative 3 includes 20.25 miles of dozer lines for prescribed burning and 70.2 miles of combined new road construction and existing road maintenance for hauling harvested timber and accessing work areas. While all of these disturbed areas are proposed to be revegetated following completion of planned activities, and many miles will be permanently closed, they will nevertheless remain as a permanent scar on the landscape. In addition to disturbing and exposing the soil, which will lead to inevitable erosion, this extensive network of roads and dozer trails will change the natural flow patterns of surface water in those areas during rainfall events. Ditches and culverts will channel and concentrate flow further exacerbating erosion and runoff, all of which ultimately flows into the Buffalo and Kings Rivers which will experience increased turbidity and sedimentation as a result. Aquatic species will be impacted and the quality of downstream waters will suffer. The problem is compounded when the totality of proposed activities are considered. Timber harvesting with associated skid trails and log pads will further disturb and expose the soil and prescribed burning and herbicide use will expose the soil surface. The cumulative effects of these activities will most certainly impact water quality of these designated areas which enjoy enhanced protection.

2. Timber Harvest

Almost 12,000 acres are proposed for silvicultural practices including regeneration, thinning, commercial harvest, etc. If such extensive timber harvesting must occur, we recommend that Single Tree Selection be the prescribed method for determining tree removal and that near-old growth timber be preserved. It is proposed that both hardwood and pine seedlings will be replanted in some areas. Recognizing that pine is much more easily established, we urge caution to ensure that conversion of hardwood stands to pine does not occur. We also recommend that timber harvest be wholly excluded from those areas specified in section 6 below.

3. Burning

Alternative 3 proposes 10,666 acres for prescribed burning. Burning (as well as other activities) is proposed up to the boundary with the Wilderness Area and up to, and in some cases across, the stream channels of the Kings and Buffalo Rivers, including inside the designated Wild and Scenic River corridor. It is stated that multiple burns will likely be required. Burning removes protective leaf litter and exposes the forest floor to increased risk of erosion and runoff, which will ultimately impact water quality of streams in the area through sedimentation and increased turbidity. We recommend that burning be prohibited inside the designated Wild and Scenic River corridor and that buffer zones be established adjacent to the Kings River and Wilderness Area. See section 6 below for additional specific exclusion zone recommendations.

4. Herbicide Usage

Alternative 3 proposes herbicide usage by various methods, including vehicle mounted applications, on 3,059 acres. Multiple applications will likely be required. Five chemicals are proposed, including glyphosate (Roundup) and triclopyr, which may be used in combination. Recent legal proceedings have found glyphosate to be carcinogenic and settlements for the case are being negotiated with the Monsanto/Bayer company. Triclopyr is likewise suspect. The Ozarks in general, and Robert's Gap in particular is characterized as having karst geology, making both surface and groundwater subject to contamination from toxins applied on the surface. Many residents in this area get their drinking water from wells and springs, which tap into this karst aquifer. The Buffalo National River is popular as a primary contact waterway for much of the year. Park visitors as well as those who enjoy the upper Buffalo River, swim, paddle, fish and in some cases drink from these waters. The introduction of toxins such as herbicides poses a risk to human health and should not be utilized in this plan. Manual practices can and should be substituted, as is proposed under Alternative 2.

5. Agency collaboration, Environmental Impact Statement needed

While the Roberts Gap plan progresses toward implementation, the Buffalo National River has just released its approved plan for its Boxley Valley Improvement project. After reading both plans, it is unclear whether the two agencies communicated on the close physical proximity of these plans that would be developed concurrently. Since the National Park Service project has already been approved, it is essential that the USFS take a deeper look at how these projects interact upon the wilderness areas for which they share boundaries. In reality, the two areas are separate in name and department designation only. They share the pristine mountainous wilderness ecoregion as the habitat for several endangered and threatened species, roadways (in particular the Cave Mountain road, and the management of tributaries to the ORW and ERW that pass through both areas.

Without a coordinated agencies approach, there will likely be considerable ecological damage due to construction and sedimentation from road improvements adjacent to Bat Cave, one of the largest Gray Bat and Indiana bat hibernacula in Arkansas. Gray Bats use Bat Cave year-round. Indiana, Northern Long-eared and Big-eared bats roost and dwell in Shagbark Hickory, Maples, Beech, downed trees, Pine snags, and karst sinkholes, caves, and fractures. As the BNR plans to improve viewing stations for elk, trail and visitor improvements at the Boxley Mill wetland, build a visitor center partnering with Arkansas Game and Fish, and construct new waste water treatment plants in the Boxley/Lost Valley area of the park, bats that forage up to six miles along tributaries and through forest understories will be disturbed from customary activities along the BNR section of the waters, while at the same time undergoing displacement and construction related disturbances by the USFS above, in the areas of Cave Mountain, Reeves mountain, Edgemon Creek and the many unnamed and uncharted tributaries, above and below ground, that feed the Buffalo River along the BNR Boxley Valley Cultural Zone.

Considering the greater extent and cumulative damage of sustainable ecosystem management disturbances from both agencies' projects, BRWA requests that the Roberts Gap plan proposal needs to conduct a deeper look through an Environmental Impact Statement (EIS) since the Forest Service failed to consider environmental information, including publicly available National Park Service plans, and specifically as this proposal impacts recreation and threatened and endangered species habitat. Competition between the gray bat, the Indiana and Northern Long eared Bats as the consequences of road building, logging, spraying, burning, and thinning in critical karst riparian reserves that serve as primary endangered and threatened bat ecological system could diminish or extinguish these species. In addition, the non-target highly sensitive macroinvertebrate species such as Mayflies, and Stoneflies that these bats prey upon will be reduced during these construction and deconstruction activities. Since the Bat Cave hibernaculum and roosting site itself runs underneath and extends beyond the section of Cave Mountain Road that the project plans to "improve" this requires a much deeper look. The project's proposed actions will almost certainly produce significant impacts that may affect the environment and recreation opportunities, and therefore, under NEPA requirements, BRWA requests that an Environmental Impact Statement (EIS) be prepared.

Gray bat (<i>Myotis grisescens</i>)	Endangered	Inhabits caves year-round. Occupies cold hibernating caves or mines in winter and warmer caves during summer (USFWS 2009).
Indiana bat (<i>Myotis sodalis</i>)	Endangered	Hibernate during winter in caves or, occasionally, in abandoned mines. During summer roosts under the peeling bark of dead and dying trees (Federal Register 2007).

Species	Status	Habitat Associations
Northern long-eared bat (<i>Myotis septentrionalis</i>)	Threatened	Summer roost habitat is generally correlated with old growth forests composed of trees 100 years old or older with low edge-to-interior ratios. Hibernates in caves or inactive mines (Federal Register 2011).
Ozark big-eared bat (<i>Corynorhinus</i> [= <i>Plecotus</i>] <i>townsendii</i> <i>ingens</i>)	Endangered	Associated with caves, cliffs, and rock ledges in well-drained, oak-hickory Ozark forests (USFWS 1995).

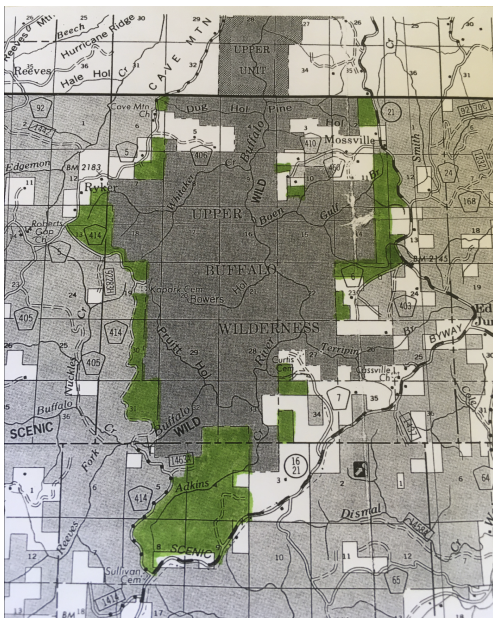
6. Potential additions to the Upper Buffalo Wilderness Area (excerpted from comments submitted by The Ozark Society)

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.

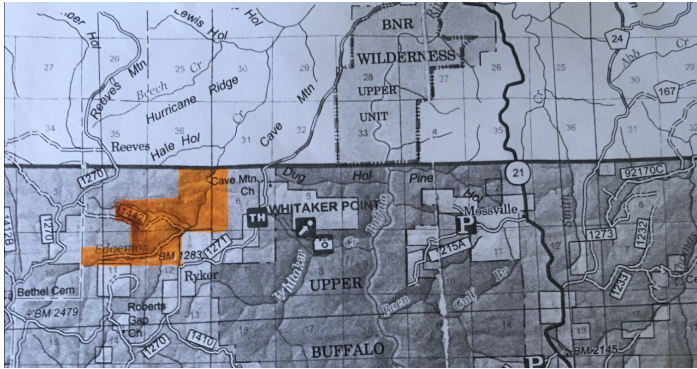
Our recommendation is that the Forest Service not plan any new road building, timber, or forest and wildlife management activities in the lands.

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.



Edgemon Creek Protected Area (excerpted from comments of The Ozark Society)



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.

7. Recreation

The Roberts Gap plan must incorporate the recreational use of this resource, and by its own count the use and need for outdoor experiences in the north/northwest region of Arkansas is growing rapidly. In light of this, it is essential to protect the outstanding resource waters that originate here. Reg 2.203, Outstanding Resource Waters: **Tier III** - Outstanding Resource Waters: water quality **cannot** be lowered where "high quality waters constitute an outstanding state or national resource, such as those designated as Extraordinary Resource Waters, Ecologically Sensitive Waterbodies or Natural and Scenic Waterways..."

Tier III waters in the Roberts Gap proposal are the Buffalo National River with its wilderness that adjoins this site, the Mulberry River, and the Kings River all find their sources here. To conserve these recreational destinations and their primary contact uses, the Roberts Gap plan must maintain the highest care for ecoregion management that enables these waters to continue to be so prized.

“On a local, regional, and national scale, the Forests assets include: A variety of high-quality recreation experiences for the approximately 58 million people that live within a 1-day drive of the outdoor recreational opportunities within the Ozark-Ouachita Highlands, which includes the Ozark St. Francis National Forests. A wide variety of outdoor recreational opportunities for four rapidly growing major metropolitan areas (Little Rock, Fort Smith, and Fayetteville, Arkansas, and Memphis, Tennessee). High quality recreation settings for hiking, mountain biking, and horseback riding on more than 650 miles of trail, 146 miles of trail for motorized recreation use, and approximately 2,700 miles of high clearance open roads.” (p. 16) (1-8 Revised Land and Resource Management Plan)

BRWA hereby adopts by reference, and in full, the comments submitted by the National Parks Conservation Association.

In conclusion, due to the extensive and extractive nature of this proposal, and in such a sensitive and extraordinary location, we recommend that this project be delayed until an Environmental Impact Statement can be prepared. The potential for as-yet unforeseen cumulative and significant impacts in this special area, and particularly risks to the Buffalo National River, is too great to proceed under the Proposed Action or any of the proposed alternatives. This project deserves a harder look.

Thank you for the opportunity to comment.

Gordon Watkins, President,

Buffalo River Watershed Alliance