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Arkansas Game and Fish Commission

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July 29, 2024

Mena/Oden District Ranger
Attention: Mena Trails
1603 Hwy 71 North
Mena AR, 71953

RE: Special Use Permit (SUP) for Trails at Mena Project #63649

To Whom It May Concern:

The Arkansas Game and Fish Commission (AGFC) has a century-long history of collaborative partnerships within the state aimed at balancing the conservation of the state's fish and wildlife and their habitats while promoting the sustainable public use of our state's rich natural resources. The AGFC greatly values our collaborative conservation and outdoor recreation partnerships involving the sustainable management of approximately 2.5 million acres of U.S. Forest Service lands within the state of Arkansas (spanning the Ozark-St. Francis and Ouachita National Forests). A formal partnership between the U.S. Forest Service and AGFC dates back at least seven decades regarding the cooperative management of fish and wildlife resources and recreational opportunities on U.S. Forest Service lands within our state.

As such, AGFC staff have reviewed the Project Documents associated with the Trails at Mena Project located at <https://www.fs.usda.gov/project/?project=63649&exp=overview>. Our agency is supportive of the Trails at Mena project recognizing the need to balance the conservation of the natural resources within the project area with sustainable outdoor recreational opportunities of varied user groups to enjoy these shared public resources. In summary, we offer the following comments:

- The proposed Special Use Permit (SUP) area on Rich Mountain is a very unique and biologically diverse area, supporting multiple local, state, and regionally endemic species. There are sixteen known species found in this area that are endemic to the state or region, while four of those are only found on Rich Mountain. As the site-specific planning for this project continues, AGFC recommends surveys of this area to fully identify and document the occurrence, distribution, and status of the irreplaceable rare and sensitive animal, plant, and vegetation communities that occur there.
- As the agency responsible for the management, restoration, and conservation of the state's wildlife resources, our staff possess extensive knowledge and expertise from working directly with these potentially impacted species and their habitats. As such, we are able to provide valuable information and insight on the scale and extent of potential impacts from the proposed actions on these species and their habitats. Our agency would welcome the opportunity to work with the U.S. Forest Service and the Arkansas

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The Arkansas Game and Fish Commission's mission is to conserve and enhance Arkansas's fish and wildlife and their habitats while promoting sustainable use, public understanding and support.

Department of Parks, Heritage, and Tourism on this project going forward and to offer suggestions to help avoid or mitigate any potential impacts resulting from the proposed actions.

- The talus habitat within the proposed project area is known to support Arkansas Species of Greatest Conservation Need (SGCN) including the tricolored bat, Rich Mountain giant earthworm, the mountain cave amphipod, and the Rich Mountain slitmouth snail. AGFC recommends surveying talus habitat for these, and possibly other, SGCNs and minimizing any impacts to talus habitat.
- The state has a great opportunity to increase outdoor recreation access across a range of diversified user groups through the Trails at Mena Project. However, it will be very important to maintain effective collaboration across a broad range of partners through the continued planning and implementation of this project to minimize user conflicts while still maintaining access for traditional recreational uses of the project area.
- As indicated in the draft EA, it is anticipated that hunting and other dispersed recreation activities that currently occur on National Forest Service land in the proposed SUP area would continue to be allowed. AGFC is committed and eagerly awaits opportunities to collaborate with U.S. Forest Service and the Arkansas Department of Parks, Heritage, and Tourism to sustain these recreational opportunities.

The opportunity to review and comment on this proposed project is greatly appreciated.

Sincerely,



Brad Carner
Deputy Director
Arkansas Game and Fish Commission