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Organization:

Title:

Comments: This letter concerns the project titled "NAEC Fiber Optic Corridors." It is submitted in response to the current request for comments. I am a botanist and ecologist. I often spent time in many areas of the Sylamore District hiking for exercise and recreation. This often includes walking along roads discussed in this project. For example, in January 2021, I hiked the Ozark Highlands trail from the Twin Creeks Road vicinity along Push Mountain Road, south to the trailhead that is close to the northeastern edge of the Leatherwood Wilderness. Rather than retrace my steps, I followed Push Mountain Road from the edge of the Wilderness, north back to my starting point. Recently, I also traveled from the southeast along Roads 1113, 1101, and 1148, as well as many other areas on the district, so I am well aware of and strongly approve of an unrelated project, the extensive prescribed burning on the district such as the burn I encountered live along the Ozark Highlands trail 2-3 days ago. My reason for mentioning this is to document that I have a strong interest in what goes on on the Sylamore.

I am not overly concerned about this specific project. I do not recall sites for *Hieracium scabrum* (otherwise known as Rough Hawkweed) within the project area, but there are a few sites for this state-rare species in Arkansas. I realize the false claim (in my opinion) might be made that this species is not a Sensitive Species on the Southern Region of the US Forest Service, but I would content that it should be listed as Sensitive. The decision to down list "state rare" or "locally rare" species from the Sensitive Species list was made by two people in the Southern Region office of the US Forest Service in the mid-2000s (obviously prior to 2010). This decision was arbitrary and capricious and was made by a wildlife biologist and the leader of the Biological and Physical Resources unit without consulting the regional botanist, Levester Pendergrass, and apparently approved by the Regional Forester. As a result, this decision is inconsistent with all other regions of the US Forest Service where Rough Hawkweed would be considered a sensitive species.

That said, Rough Hawkweed is, based on my observations, a species that thrives with disturbance, so I would expect this project would have a positive impact on Rough Hawkweed although individuals may be negatively impacted or killed by this proposed action. My main goal is to make the district aware of this inconsistency based on the arbitrary and capricious action of the Southern Region of the US Forest Service.

For more information on the distribution of this species on the district and in Arkansas please check with various in-state and out-of-state herbarium websites as well as the www.inaturalist.org website.