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Comments: A review of the NEPA Environmental Assessment for the White River Aspen Management Project #59419 does not include any consideration of caves and karst regions within the Forest. Throughout the Forest, particularly on the White River Plateau and in regions north of Aspen and south of Eagle, contain delicate caves and karst.

A management plan for aspen removal must include detailed information regarding the protection of these features. In past tree management projects on White River National Forest lands, such as in the Crooked Creek area near Thomasville, Forest personnel have consulted with local representatives of the National Speleological Society in identifying regions of caves and protecting them from clear cutting, dumping of slash, and other practices that are harmful to cave life and to the flow of water through underground passageways.

This project must consider the impact such Forest management will have upon cave features, many of which have been designated as significant under the Federal Cave Resources Protection Act of 19889 (see <https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter63&edition=prelim>).

There is also no consideration of the impact the project will have on wildlife of the region being timbered. This can impact bats that live within the Forest and roost within trees and adjacent rock outcroppings, caves, mines, and other features. This is a particular concern at this time, in that the *Pseudogymnoascus destructans* fungus that creates White Nose Syndrome among select species of hibernating bats is spreading into the Mountain states from South Dakota and Wyoming (see [https://www.usgs.gov/faqs/what-white-nose-syndrome?qt-news\\_science\\_products=0#qt-news\\_science\\_products](https://www.usgs.gov/faqs/what-white-nose-syndrome?qt-news_science_products=0#qt-news_science_products)). Biologists within the White River National Forest and Colorado Department of Parks and Wildlife have been studying bats and identifying locations of bat roosts and colonies throughout Colorado, including many regions of the White River National Forest. How will extensive timbering and removal or burning of trees impact bats? The environmental protection plan for this project is silent on this issue.

The White River National Forest must reconsider this project through additional study and consideration of these important issues.