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First name: Gordon

Last name: Watkins

Organization: Buffalo River Watershed Alliance

Title:

Comments: Objections to: Draft Decision Notice and Finding of No Significant Impact, Robert's Gap Project, US Forest Service, Ozark-St. Francis National Forests, Big Piney Ranger District, Newton, Madison Counties, Arkansas Project name and location: The Robert's Gap Project area is 39,697 acres of National Forest System (NFS) lands located close to the communities of Boston, Fallsville, and Red Star. This project is in the northwest corner of the Big Piney Ranger District in Newton and Madison Counties. Responsible officials: Timothy E. Jones, District Ranger; Mike Mulford, NEPA Coordinator, Big Piney Ranger District, Objector's name and address: Gordon Watkins, on behalf of the Buffalo River Watershed Alliance, PO Box 101, Jasper, AR 72601. 870-446-5783. Signature available on request. Submitted electronically on May 20, 2021 to ozarkobjection@usda.gov These objections incorporate by reference those comments previously submitted on September 3, 2020 by this author on behalf of the Buffalo River Watershed Alliance during the public comment period for this project. The conclusion of those previous comments stated, "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." ENVIRONMENTAL IMPACT STATEMENT Our previous comments included concerns about roads, timber harvest, prescribed burning, herbicides, agency collaboration, protection of the Upper Buffalo Wilderness Area, bats, and recreation. In particular, we are concerned about the cumulative impacts of these practices and their impacts not only within the project area but downstream on the water quality of the Buffalo National River. With the exception of some minimal reduction in herbicide usage and timber management acreage, there are apparently no changes responsive to our previous comments. In fact, the acreage for prescribed burning has been increased by 646 acres to a total of 11,311 acres. Because the cumulative impacts remain inadequately addressed in the Draft Decision, we reiterate our previous comments that this project deserves a harder look and specifically that an Environmental Impact Statement specific to the Robert's Gap project area is warranted and required. HERBICIDES While there will be a reduction of 622 acres of woodland treatment using herbicides, herbicide applications will still be implemented on 2,397 acres of the project. The Draft Decision Notice acknowledges that manual alternatives to herbicides are feasible and, in the case of the woodland treatment MA, "fits better with the goals established in the Forest Plan". Our contention is that manual alternatives to herbicides fit better with the Forest Plan goals of all MAs and herbicide usage should be eliminated altogether from this project. While the Draft Decision Notice claims that "our analysis shows no thresholds or public safety would be compromised using this [herbicide] treatment", new information made available after the previous comment period closed shows otherwise, in particular regarding Triclopyr, one of several herbicides listed for use. On April 29, 2021 the 9th Circuit Court of Appeals ruled that the EPA must take steps that will likely force Triclopyr/chlorpyrifos off the market due to safety concerns. See <https://www.documentcloud.org/documents/20693912-chlorpyrifos-9th-circuit-4-29-21> The court found that EPA has known for years that Triclopyr was linked to brain damage in children, and that, "During that time, the EPA's egregious delay exposed a generation of American children to unsafe levels of chlorpyrifos," The court concluded, "The EPA's obligation is clear: it must modify or revoke chlorpyrifos tolerances and modify or cancel chlorpyrifos registrations". This is but one example of the often unknown and unacceptable risks posed by herbicide usage. The Draft Decision must be modified to eliminate Triclopyr from this management plan and, in the interests of public and environmental safety, all proposed herbicides should be eliminated from this project in favor of manual alternatives. ENDANGERED AND THREATENED SPECIES We previously commented on the threats to bats posed by the cumulative impacts the various proposed practices, such as timber harvesting, prescribed burning and herbicide usage will have on bat food sources, especially the highly sensitive macroinvertebrates that sustain their diet. These impacts that affect the bats' ability to thrive in these remote areas need deeper consideration. Herbicides and burning are a two pronged attack on these highly sensitive

species. A natural forest life-cycle habitat progression is key and perfectly suited to the continued survival of these last living remnants of white-nosed endangered bats. Target and nontarget species and their intricate interactivity with the bat population will be unduly affected by the plan as described in the Draft Decision Notice. The established forest biotic community with its deadwood snags as well as standing dead or old growth trees like Shagbark Hickory that bats require for roosts is essential for bat livelihood. The fragmentation of the Ozark forests emphasizes the value of leaving these wilderness and near-wilderness areas intact. For example, over the thousands of years of its development, this understory habitat underscores the role which forest floor mycorrhizal fungi symbioses plays in forming unique relationships with specialized soil fungi and the health of the plants and animals attuned to living and thriving there. Prescribed burning and herbicides disrupt this process. See https://www.fs.fed.us/psw/publications/documents/psw_gtr151/psw_gtr151_12_molina.pdf. The traditional practices of forest simplification and homogenization necessitate that the USFS take into consideration the need to conserve this unique working interconnected complex ecosystem. See <https://lib.dr.iastate.edu/cgi/viewcontent.cgi?article=5813&context=etd>. A reexamination of historical and planned prescribed burns in the Ozark forest habitat that hosts the bats of concern must be conducted, including those burns by AGFC, privately owned wooded lands converting to pasture, and the Buffalo National River Park. These should be assessed cumulatively for effects on the remaining USFS Robert's Gap endangered bat habitats and include interagency planning and research that already considers effects of extensive burning on bat migrations in this Ozarks region. A site specific EIS will identify the areas that reliably meet the needs of the bats, and will delineate essential areas being reduced by historical, ongoing and planned burnings throughout the region. Tables 13 and 14 of the Draft Decision include footnotes stating, "These areas are within, or partially within, a secondary conservation zone for the federally endangered Indiana bat and are restricted to harvesting between December 1 and March 15 unless there is further coordination with the USFWS, and site-specific inventories are conducted." (emphasis added). Please explain in detail what would trigger such coordination since it appears that one is necessary here. A site specific analysis is needed to ensure these bat species are protected from extinction in the rivers' karst headwaters watershed. RECREATION Considering the actual economics of this plan, logging jobs are a high cost alternative and timber harvesting in this remote area is uncertain work when compared with bringing in tourists, hikers, and bicyclists who will add more and more to rural family incomes through cabin rentals, work at concessioner businesses, shops and restaurants. Northwest Arkansas is growing exponentially and popular destinations for outdoor enthusiasts include the pristine Robert's Gap area. with obstacles such as its steep hollows, bluffs, unpredictable karst hydrogeology, and eroding soils from previous cuts and logging roads. In addition, this plan affects the highest quality, most popular recreational rivers in Arkansas and the Ozarks, the Buffalo National River, the White River, and the Kings Rivers. To meddle with their historical wilderness balance is unnecessary and is a presumptuous attempt to predict future positive USDA outcomes. Such predictions have not always proven to be accurate. Previous USFS policies directed at fire suppression ("Only you can prevent forest fires") are an example. Many downstream rural communities' livelihoods depend on the protection of these forests and headwaters. A deeper look with a site specific Environmental Impact Statement (EIS) taking into account and mapping its many karst hydrogeological features is required. Even in a single hollow, different tree species grow on either side depending on north or south facing hillsides and microclimates. General rules and formulas are not the appropriate means to assess this unique and fragile watershed. Sincerely, Gordon Watkins, President Buffalo River Watershed Alliance

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