



**100 YEARS**

Sept. 3, 2020

Mr. Timothy E. Jones  
Big Piney Ranger District  
12000 SR27  
Hector, AR72843  
Re: Roberts Gap Project, #53597

Dear Mr. Jones:

On behalf of National Parks Conservation Association (NPCA), thank you for the opportunity to submit comments on the Ozark-St. Francis National Forest's Project #53597 at Roberts Gap. We are submitting comments because this project has great potential to adversely impact Buffalo National River, a unit of the National Park System. Since 1919, NPCA has been the leading voice in safeguarding our national parks. NPCA and its nearly 1.4 million members and supporters work together to protect and preserve our nation's most iconic and inspirational places for future generations.

The purpose of this project is to:

- Promote native forests that are more resilient to natural disturbances by improving forest health and increasing diversity of species composition and productivity.
- Maintain and improve water quality as this area holds the headwaters of the White River, Kings River and Buffalo River.
- Reduce hazardous fuels and increase herbaceous plant species.
- Address access and visitor use concerns for the mountain bike trail system and Upper Buffalo Wilderness Area.

Our primary concern is the protection of water quality and native species, including the endangered bat populations that depend on this habitat to feed, breed and shelter their young. We are concerned about creating new roads, bulldozer cuts, Off Road Vehicle (ORV) trails and mountain bike paths in the Upper Buffalo Wilderness Area. New or temporary disturbance of this area relates to increased sedimentation in the Upper Buffalo River. The Upper Buffalo Wilderness and the Buffalo Wild and Scenic River are the headwaters for the Buffalo National River, a unit of the national park system.

Buffalo River flows north through the Upper Buffalo Wilderness in the eastern part of the project area and becomes the Buffalo National River as it exits the National Forest. An Extraordinary Resource Water (ERW) is defined as a combination of the chemical, physical and biological characteristics of a water body and its watershed characterized by scenic beauty, aesthetics, scientific values, broad scope recreation potential and intangible social values.

Our comments are meant to prioritize actions (or inactions) that protect potential wilderness and the Upper Buffalo River and preserve its characteristics as an ERW. As noted in the Environmental Assessment 58 percent of the land in the project area is U.S. Forest Service and 88 percent of the area is forested. Measured erosion for minimally disturbed forestlands rarely exceeds 0.25 tons per acre. We

respectfully ask that the U.S. Forest Service make choices that minimally disturb sensitive areas or consider no disturbance at all in these sections.

We concur with our colleagues at The Ozark Society that the following list of compartments and activities proposed in Alternative 3 be excluded in the Roberts Gap Project by the Forest Service in order that these area may be designated as Wilderness in the future:

- 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, Timber Stand Improvement
- 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.
- Comp. 66, Pine Thinning

In January, 1975, Congress passed Public Law 93-622 designating the Buffalo Wilderness Area within the National Wilderness Preservation System. Congress found and declared that it is in the national interest that these and similar areas in the eastern half of the United States be promptly designated as wilderness within the National Wilderness Preservation System, in order to preserve such areas as an enduring resource of wilderness which shall be managed to promote and perpetuate the wilderness character of the land and its specific values of solitude, physical and mental challenge, scientific study, inspiration and primitive recreation for the benefit of all of the American people of present and future generations.

Congress went on to say,

“In furtherance of the purposes of the Wilderness Act, the following lands (hereinafter in this Act referred to as "wilderness areas"), as generally depicted on maps appropriately referenced, dated April 1974, are hereby designated as wilderness and, therefore, as components of the National Wilderness Preservation System— . . . . . and certain lands in the Ozark National Forest, Arkansas, which comprise about ten thousand five hundred and ninety acres, are generally depicted on a map entitled 'Upper Buffalo Wilderness Area—Proposed', and shall be known as the Upper Buffalo Wilderness.”

Congress recognized the importance of

“additional areas of wilderness in the more populous eastern half of the United States, are increasingly threatened by the pressures of a growing and more mobile population, large-scale industrial and economic growth and development and uses inconsistent with protection.”

To that end we ask that the 3,000 acres of land that are proposed wilderness must be managed in a way consistent with future wilderness designation.

Logging operations, cutting and repairing roads for forestry or motorized and mechanical recreational purposes such as ORV use and mountain biking, and bulldozing trails is not appropriate in wilderness or proposed wilderness. NPCA respectfully asks that wilderness characteristics be considered and prioritized and that every effort is made to protect water quality, biodiversity and threatened and endangered species so that the extraordinary resource waters of the State of Arkansas and the national river are not degraded by this project

Thank you for all you do to protect our nation’s natural resources,



Emily Jones, Campaign Director  
Southeast Region, National Parks Conservation Association

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