



March 30, 2000

Mr. Charlie Daniels, Chairperson
Natural Resources Committee
109 State Capitol
Little Rock, AR 72201

Dear Mr. Daniels:

It has come to my attention that a request has come before the Arkansas Land Commission to remove sunken logs from the lower Saline River. The goal of our organization is to promote the wise management, conservation and use of Arkansas' fishery and aquatic resources. We are concerned that the process of log extraction could have a detrimental impact on the ecological integrity of the Saline River.

The log extraction operation could directly impact native mussels and their habitat. Although no federally listed threatened or endangered mussel species have been documented to occur in the lower Saline River, a systematic mussel survey has not been conducted there. It is possible that three endangered mussel species (the winged mapleleaf, Ouachita rock pocketbook, and pink mucket) occur in the lower Saline.

It is our understanding that the state of Arkansas has placed several restrictions on the methodology of the log extraction: that sonar equipment and divers will be used to locate the logs, and that the logs will be winched to the surface avoiding native mussel beds. However, sonar equipment is not technologically capable of consistently and reliably distinguishing between native mussels and gravel-cobble substrate. It may not be prudent to expect divers, trained in log extraction, to also be responsible for surveying mussel beds. Furthermore, the large metal plates, which serve as platforms for the stilts on the jack-boat, could destroy thousands of native mussels each time they are deployed.

Native mussels are the most imperiled group of aquatic organisms in the state and nation. These organisms cannot move quickly to avoid harm. They are important components of aquatic ecosystems and have economic value where they are properly managed. We recommend that a mussel survey be conducted prior to any log extraction activity on the Saline River. Certainly, log extraction activity should not be permitted to damage threatened or endangered species or their critical habitat in violation of federal law.

Log extraction could also increase the sediment load of the river, change the stream morphology, alter its natural hydrology, and increase bank erosion and channel scouring. Though we have spoken to Arkansas Game and Fish Commission biologists who observed the log extraction operation, it is unclear what volume of logs will be removed from the Saline River. Research in our field has consistently shown that large woody debris (predominantly submerged logs) has an important function in stream ecology, for

example, providing habitat for fish and aquatic insects. It might be argued that these logs were artificially placed on the stream bottom. However, if extensive logging in riparian areas had not been done in the past century, our streams would probably contain much more large woody structure than they do now.

Logs, which have been lying on the river bottom for almost a century, have collected a significant amount of sediment. When this fine sediment is disturbed, it will be transported and deposited somewhere downstream. In that context, it should be noted that Felsenthal National Wildlife Refuge is located just downstream of the proposed log extraction project. The increased sediment influx could hasten the filling of this shallow, yet productive ecosystem.

The US EPA considers sedimentation one of the most significant pollution problems in our streams. Sediment deposition can fill small pore spaces where some invertebrates and small fish live between larger gravel and cobble substrate. Sedimentation can fill in pools, which lessens habitat for pool-dwelling species and can interfere with respiration of aquatic organisms, their young, or eggs in some cases.

Our organization strongly opposes that any action be taken on this request until further investigation has been done to reveal possible environmental impacts from the proposed activity. The burden of proof of “no effect” to Saline River ecological integrity should be required of the permittee through an environmental assessment funded by the permittee.

We are not necessarily opposed to log extraction in the Saline River, but no such activity should be permitted until potential impacts are revealed and a cost-benefit analysis performed. This decision will set a precedent for similar log extraction operations in other Arkansas rivers. It is my understanding that a similar request has already been submitted to the Land Commission to remove sunken logs from Bayou Bartholomew.

We urge the Natural Resources Committee to prohibit any log extraction activity until it has been demonstrated that short-term economic benefits of such actions are not outweighed by long-term ecological damage to the river. We appreciate the Committee’s consideration of our concerns and we ask to be kept informed regarding the developments in this proposal.

Sincerely,

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x.c. Governor Mike Huckabee