Boswell Creek Watershed Healthy Forest Initiative Project
Scoping Response Analysis

Scoping Comment		Subject
1 – Sierra Club – Lone Star Chapter		
1	Lack of public access to site-specific environmental data for the proposal has harmed the Sierra Club's ability to provide site-specific comments.	NEPA Process - Conduct of scoping
2	The scoping letter has pre-judged the proposal by stating that "we do not expect significant effects." Cumulative effects have not been addressed.	NEPA Process - Analysis of effects
3	The CEQ guidelines for addressing cumulative effects have not been met in the scoping notice.	NEPA Process - Analysis of effects
4	Additional pine plantation management for a single commercial species of pine poses cumulative impacts.	Vegetation - Management of pine
5	The effects of long-term killing, wounding, and diminishment of 10,000's of hardwood trees of all species and sizes including seedling, sapling, pole, and sawtimber sizes.	Vegetation - Hardwood structure and composition
6	The effects of the reduction in shade and the resulting increase in temperature of the forest.	Vegetation - Structure and composition of the forest and its effects on fuels and fire behavior
7	The effects of reductions in forest canopy on increased sunlight and dryness in the forest.	Structure and composition of the forest and its effects on fuels and fire behavior
8	The long-term reduction in soft and hard mast from many different kinds of hardwoods and the effect on game, non-game, and sensitive species.	Hardwood hard and soft mast production
9	The long-term reduction for game, non-game, and sensitive wildlife species of shelter provided by cavities and dens in hardwood trees.	Hardwood cavities and dens
10	The long-term reduction in forest structure provided by at least three layers of trees including overstory, understory, and midstory.	Changes in forest structure
11	The long-term reduction in snags and coarse woody debris (downed trees and parts of trees) for game, non-game, and sensitive wildlife species, soil enrichment, and erosion control.	Wildlife Habitat components - Changes in forest structure
12	The long-term reduction in visual quality due to the reduction in hardwoods species like hawthorns, plums, and dogwoods.	Vegetation - Hardwoods/ Flowering species
13	The long-term reduction in sight that will occur because the forest will not have a heavy canopy which shades out many smaller trees and opens up the forest for visual observations.	Scenery Management - Effects of management actions on the understory character of the forest
14	The long-term reduction in hiking in thin logged and burned areas due to the explosive growth of young vegetation including seedlings, saplings, vines, and shrubs which physically inhibits hiking due to greenbrier and blackberry thorns and additional ticks and chiggers that lives on this young growth of vegetation.	Recreation - Effects on the Lone Star Hiking Trail
15	The assessment of cumulative effects that documents the statement in the scoping notice that "we do not expect significant effects" must be provided to the Sierra Club.	NEPA Process - Analysis of effects
16	The scoping letter discourages public participation by stating that "We have not identified any alternatives to the proposed action at this time." The FS must develop alternatives.	NEPA Process - Conduct of scoping
17	There are "reasonable alternatives" to the proposed action. The FS, Texas Forest Service, and others could provide educational, technical,	NEPA Process – Alternatives

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	and grant assistance to adjacent private property owners and in-holders in the BCW to treat their property and structures so that they are fire-proofed.	
18	There is no alternative in the scoping letter that manages for a denser forest canopy that…shades the ground and forest fuels from elevated temperatures due to sunlight…provides moisture by transpiration…slows air movement and is a barrier to downslope winds.	NEPA Process - Alternatives
19	There is no alternative that increases the percentage of hardwoods in 15-20 year old pine stands and mature pine stands to…provide more shading and cooling…transpire more water making relative humidity and overall moisture content greater…thus reducing fire hazard. Hardwoods reduce SPB hazard.	NEPA Process - Alternatives
20	There is no alternative that protects older and larger trees in the scoping letter. Large trees are more fire resistant and provide more shade and thus reduce fire risk.	NEPA Process - Alternatives
21	What is needed is an alternative that addresses restoration of the original Loblolly Pine, Shortleaf Pine, and Mixed Hardwood Ecosystems. The HSC has proposed a set of principles for restoration for SHNF that could be developed into an alternative.	NEPA Process - Alternatives
22	The scoping proposal states that fire or SPB would adversely affect the long-term production of quality Red-cockaded woodpecker habitat even though it is not stated that RCW do not currently inhabit the area. This is important information that the public should have but the FS remains quiet about this fact.	NEPA Process - Adequacy of information about RCW in the scoping letter.
23	There is no explanation in the scoping letter how "unacceptable risk" of loss to wildfire or SPB was calculated, the assumptions, made during this assessment, and relation of this assessment to natural, past, and landscape conditions and risks.	NEPA Process - Conduct of scoping
24	There is no information in the scoping letter for the public to review and comment on in relation to past fires, fire risk, and hazard.	NEPA Process - Conduct of scoping
25	The number of miles of road/square mile is information that is important to have in the scoping letter and DEA. The more roads/square mile the more likely a human caused fire is to occur since 85% of fires are caused by humans and most of these occur near roads. More roads/square mile also increases access which allows fire fighting equipment to get closer to the fire quicker.	NEPA Process - Conduct of scoping
26	The burning proposed does not mimic the natural fire frequency, duration, intensity, rate, seasonality, evenness of burn, start locations, regime, and vegetation mosaic/patchiness. The FS proposes to burn 2-10 times more frequently than what the ECS description of the loblolly pine ecosystem states. Burning at this unnatural, elevated frequency has a definite ecological effect on plants and animals of the loblolly pine and shortleaf pine forest ecosystems.	Prescribed Fire - Mimicking "natural" fire/The effects of fire on plants and animals
27	The proposal does not recognize that there are a number of stands in the Boswell creek Watershed that the FS or others have determined may be suitable for future old growth designation. An assessment of old growth is needed to determine if these areas are suitable for old growth designation.	Vegetation - Old Growth
28	The FS must explain how old growth needs are fully addressed without designating more old growth especially since burning, salvage logging, SPB logging, and other management practices are allowed in MA-4, a management area that provides for old growth designations.	Vegetation - Old Growth
29	The impacts of thinning and burning in the Boswell Creek HFI on old	Vegetation - Old Growth

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	growth characteristics in all or parts of the following stands: C-74, St-9 C-75, St-14,15 C-76, St-1,3,9,10,14,15,19,20,23	
30	The effects of thinning and burning on the scenic quality along the Lone Star Hiking Trail in Compartments 69, 70, 72, 73, and 74. A corridor of 75 to 150 feet on both sides of the trail must be established where no burning or thinning will be done.	Recreation - Effects on the Lone Star Hiking Trail
31	Protection of Streamside Management Zones (Management Area 4) associated with Boswell Creek, Briar Creek, Thicket Branch, and Brandy Creek. Burning in MA-4 damages vegetation that normally grows in these moister areas. All management activities should be excluded from MA-4 areas (associated with perennial and intermittent streams) and from ephemeral stream protection zones.	Vegetation - Effects of fire on vegetation in SMZs
32	The scoping notice is deficient because it does not include important information that the public can analyze, review, and comment on during the public notice period. Following the comment is a list of 7 types of information that were not included in the scoping letter.	NEPA Process - Conduct of scoping
2 – H.A. (Joe) Pase III – Texas Forest Service – Forest Pest Management		
1	Since the 1980s, half or more of all reported SPB infestations have been on NF land even though NF lands represent about 5% of commercial forest land in Texas. Almost all the stands rated as high hazard to SPB are on NF lands. More thinning of National Forest timber is needed to reduce the impact of southern pine beetle on National Forest lands in Texas.	Purpose and Need for Action - SPB hazard on NF land
2	Lands adjacent to NF land are being subdivided as people move to the "country". People and property are at risk when fuel conditions are not managed.	Purpose and Need for Action - Increased human development and fuel hazard
3	Both SPB and wild fires can destroy cavity trees and foraging habitat of the endangered red-cockaded woodpecker.	Purpose and Need for Action - Effects on RCW habitat
3 – Larry Shelton		
1	The majority of the area consists of loblolly plantations that were unnaturally established following SPB infestations…it must be acknowledged that these plantations were not established under ECS guidance…management should restore the site to its potential natural vegetation…it has not been established on any scientific basis that the proposal to log and burn the area on a frequent schedule would in fact lead to restoration of the acknowledged potential vegetation for the area.	Vegetation - Consistency with Ecological Classification System
2	The proposed treatments are silvicultural applications which are used to accelerate the production of salable forest products…a de facto reallocation of the site to an accelerated timber production category…the move would in fact require an amendment or revision to the LRMP.	Forest Plan – Proposed Actions are not consistent with the Plan and would require an amendment or revision.
3	While the scoping letter asserts that the proposal would…improve the viability of the plantations for RCW habitat in the future there is no evidence available to affirm this. By postponing thinning, height growth would be promoted. Taller trees allow higher placement of cavities on the bole that…puts more distance between fires and climbing predators of the RCW. Competition also contributes to onset of red heart…faster growing trees…have thicker sapwood for the RCW to penetrate in cavity excavation…it has yet to be demonstrated that fast growing plantation pines will ultimately produce good cavity trees.	Red-cockaded Woodpecker - Production of long-term RCW nesting habitat.

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4	The statement that the plantations have a high SPB hazard rating is…misleading…losses are lower due to the relatively small breeding substrate surface of small boles…these small infestations…create a more resilient structure. A restoration to the acknowledged natural stand structure of loblolly pine is the best way to cut SPB losses.	Purpose and Need for Action - Inadequate rationale for reducing SPB hazard through thinning
5	The proposal does not provide information as to the relative "fuel hazard" of the Boswell Creek area compared to other areas of the SHNF. Why was this area chosen? East Texas has not experienced the type or frequency of catastrophic wildfire that the HFI purports to reduce…there is no need for this proposal.	Purpose and Need for Action - Inadequate rationale in the scoping letter to support fuel reduction
6	This proposal would produce fast growing pine forest products with little other structure to meet the needs of cavity or mast dependent fauna.	Vegetation - The effects of thinning and prescribed burning on forest composition and structure and their effects on cavity and mast dependent wildlife.
7	The proposal also seeks to implement NEPA changes that reduce the real choices that citizens have in voicing how public lands are managed. These changes are an effort to allow high impact activities such as timber harvesting to be carried out without adequate consideration of the impacts.	NEPA Process
8	The Boswell Creek area possesses no unique attributes which qualify it for the HFI as proposed. The proposed change in management regime is a significant departure from overall strategies laid out in the LRMP and should require a revision.	NEPA Process
9	There is no evidence that the proposed schedule of burning and logging would make the area any "healthier" as defined by overall biological and vegetation potential standards. Any action should be focused on natural vegetation structure for loblolly communities.	Purpose and Need for Action – Disagreement on definition of a healthy forest
10	By reducing the overall homogeneity of loblolly and promoting as appropriate level of mast producing hardwoods a more resilient forest will result with respect to fuels and SPB. This could be accomplished through uneven aged management using group selection.	Alternatives – increase hardwood composition to alleviate fuels and SPB concerns.
4 – Anne Tindell		
1	This program…is no more than an excuse to allow the timber industry virtually unrestricted logging and excess burning with no benefit to the public.	Purpose and Need for Action – disagree with need for action
2	The proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one-species pine plantations, which are dryer, less humid, and less shaded than natural hardwood-pine forests.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
3	The proposed burning will kill, wound, and reduce fire-retarding hardwoods that provide food and shelter for wildlife.	Vegetation – Effects on hardwoods
4	The proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
5	The proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
6	The proposal threatens the Lone Star Hiking Trail by burning and logging in these areas	Recreation - Effects on the Lone Star Hiking Trail
7	The FS states that alternatives to its proposal have not been identified, and that the proposal will have no significant detrimental environmental impact. However, there will be negative impacts and there is an alternative.	NEPA Process - Analysis of effects
8	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
5 – David L. Haviland, PhD		
1	The proposal will lead to greater fire and insect risk because it creates	Purpose and Need for Action –

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	4,800 acres of fire vulnerable forest.	Actions would increase fire and insect risk in existing plantations
2	I have backpacked and hiked parts of Four Notch trail and camped in the forest overnight. I very much enjoyed the corridor with the canopy along the trail.	Recreation - Effects on the Lone Star Hiking Trail
6 – Monica Geick		
1	I am opposed to this new plan and do support the Houston Sierra Club's Plan.	Alternatives
2	I am concerned about not only trees, but birds that call this forest their home.	Effects on wildlife
7 – Cliff Rushing		
1	It appears to me that the result of this project would be species conversion from a natural mixed species forest to a single species pine farm…a single species farm is more susceptible to pests and fire…it seems inappropriate to experiment in a watershed.	
2	It is inappropriate to increase the controlled burns in the Sam Houston National Forest…2-5 year burns seem totally unnatural. I would think that natural fires would have occurred more like every fifty to one hundred years. Burning this frequently will of course suppress the hardwood growth in the forest…a naturally diverse forest will be more resistant to pests and fire.	Mimicking "natural" fire regimes Prescribed fire effects on vegetation
3	Please consider the alternative proposed by the Houston Sierra Club.	Alternatives
8 – V. Rock Grundman		
1	I would think that the burning should improve the habitat for forb loving species, including deer, turkey and other birds.	General statement of support
9 – Sandra N. Penz		
1	The proposal would increase the burn schedule in the forest to a frequency that would assure more danger of fire…more scheduled burns decrease hardwoods which are much more resistant to fire than pines.	Prescribed fire effects on hardwoods
2	Pine plantations are significantly less hospitable to wildlife than mixed forests. A mixed forest results in varied food sources and possible nest or shelter sites for the variety of animals that should be present in the East Texas woods.	The effects of managing pine plantation on wildlife.
10 – Texas Committee on Natural Resources – Edward C. Fritz		
1	What actions do you promise to prevent Southern Pine Beetles from damaging each compartment in your list? Give data on action and results.	Actions taken to prevent SPB
2	When and where would you introduce how many Red-cockaded woodpeckers into compartments noted?	Red-cockaded woodpecker translocation
3	How many RCW are already in which compartments?	Red-cockaded woodpecker status
11 – Peggy B. La Point		
1	The proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one-species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	Burning every 2-5 years will kill, wound, and reduce fire-retarding hardwoods that provide food and shelter for wildlife.	Vegetation – Effects on hardwoods
3	Burning every 2-5 years threatens potential future old growth forests.	Vegetation – Effects on Old Growth
4	Burning every 2-5 years threatens streamside forests.	Vegetation – Effects on SMZs
5	Burning every 2-5 years threatens the Lone Star Hiking Trail.	Recreation - Effects on the Lone Star Hiking Trail
6	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
12 – David Todd		

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1	The FS proposal is counterproductive, and will actually increase fire and insect risk because it will create a monoculture pine plantation, which is known to be dryer, less humid, and less shaded than natural hardwood/pine forests, with more forest floor tinder available to fuel fires.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	The Sierra Club has proposed a viable alternative that reduces both fire and insect risk, protects private structures, and restores natural forests on public lands.	Alternatives
13 – Marlene Harter		
1	I oppose the FS proposal and support the Houston Sierra Club alternative.	Alternatives
2	The FS proposal will kill, wound, and reduce fire retarding hardwoods that provide food/shelter for wildlife.	Vegetation – Effects on hardwoods
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
14 – Ronald H. Hufford – Texas Forestry Association		
1	TFA is in support of the proposed actions…the association recognizes the need to manage the forest resources to reduce the potential for wildfire as well as the loss of the resource to insect infestations such as the Southern Pine Beetle.	Purpose and Need – General support for the proposal
15 – Dale Bounds – National Wild Turkey Federation – Texas State Chapter		
1	The Four Notch/Boswell Creek Healthy Forest Initiative site received 15 wild turkeys as part of a restoration program. This 15-year-old forest needs thinning and prescribed fire introduced to the area. These management activities would make the area prime wild turkey habitat and provide much needed acres for public use in Texas.	
16 – Alan D. Dreesen		
1	I am in favor of the good sense approach the President has taken regarding the highly sensitive federal lands that pose a potential threat to private property and the nation's resources.	Purpose and Need – general statement of support
2	I support your proposal in principle	Statement of support
17 – Sharon Poessel		
1	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	More flammable fuels grow in open pine plantations, and the burning proposed threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
3	More flammable fuels grow in open pine plantations, and the burning proposed threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
4	More flammable fuels grow in open pine plantations, and the burning proposed threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
5	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
18 – Thomas W. La Point, PhD		
1	Your conclusion that this proposal will cause no significant environmental impacts is incorrect.	NEPA Process - Analysis of effects
2	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and

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		insect risk in existing plantations
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
19 – Lisa R. Meacham		
1	The HFI is really an excuse to allow timber industry logging on and over-burning of our national forests.	Purpose and Need for Action – general disagreement about need for action
2	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
6	The FS states that there are no significant environmental impacts that its proposal will cause…this is not true.	NEPA Process - Analysis of effects
7	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
20 – Kristin Sands		
1	The HFI is really an excuse to allow timber industry logging on and over-burning of our national forests.	Purpose and Need for Action - general disagreement about need for action
2	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
6	The FS states that there are no significant environmental impacts that its proposal will cause.	NEPA Process - Analysis of effects
7	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
21 – Pat McLeod		
1	Please do not increase timber logging and burning as part of the Healthy Forest Initiative.	General disagreement about need for action
2	Burning kills the small trees and adds to the one species forest.	Vegetation – Effects on hardwoods
3	The smoke (from prescribed burning) adds air pollution.	Air Quality – effects of burning
4	Please consider the Sierra Club proposal as an alternative.	Alternatives
22 – Michael G. Messina – Texas A&M University		
1	I concur with your assessment of the need for thinning and prescribed burning.	General agreement with need for action
2	I do not foresee any significant adverse effects associated with this project.	General agreement with the project
23 – Leo A. Reitan		
1	What is the history of fire in the area considered for the HFI?	Fire History

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2	Burning every 2-5 years may be too often. Burning that often may kill the deciduous trees leaving only the pines which probably increases the risk of southern pine beetle outbreaks.	Vegetation – Effects on hardwoods
3	The percentage of deciduous trees in the forest should be allowed to increase which would reduce fire risk and pine beetle risk.	Alternatives – Increase hardwood composition to address fuel and SPB risk
4	I doubt that thinning will do anything to reduce the risk of fire. Thinning will put a great deal of very flammable debris on the ground.	Purpose and Need for Action – Actions would not decrease fire risk
24 – Stephen S. Bates		
1	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	The FS proposal will kill, wound, and reduce fire retarding hardwoods that provide food/shelter for wildlife.	Vegetation – Effects on hardwoods
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
6	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
25 – Shayda Naficy, Hamid Naficy,Cameron Naficy, Carol Edwards		
1	I am writing to…emphasize my opposition to the FS proposal.	General disagreement about need for action
2	The FS proposal is a disastrous, poorly thought out excuse to wrongfully justify extraction of timber from publicly owned national forests. The forests do not need timber extracted from them to be healthy.	General disagreement about need for action
3	While it may be true that in some areas forest that are young…may be more prone to fire than older stands…the natural progression of the forest will tend to reduce these risks. Extraction cannot be good for the forest.	General disagreement about need for action
4	Fire to some extent is a natural part of forests that helps to rejuvenate them and allow for a new succession of plants, adding diversity to a veteran forest.	Actions are not needed since fire is a natural process
5	Planting hardwood trees (as suggested by the Sierra Club)…seems a good way of introducing that will resist catastrophe or catastrophic events like bug invasions or fire.	Alternatives – planting hardwoods to reduce fire and SPB risks
6	Protecting people…is important, but fire has never been a major problem in the areas where there are more effective, long-term, and aesthetically pleasing ways of protecting locals.	Actions are not needed because fire has not been a major problem in the past in the area.
7	I suggest using the techniques the Sierra Club has developed…from a scientific and aesthetic perspective our forests do not need the "HFI".	Alternatives
8	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
26 – D. Marrack M.D.		
1	Converting the area into…a conifer monoculture is not consistent with NFS stated goals or the public interest and multi-use.	Vegetation – Effects on hardwoods
2	The FS proposal will destroy important old-growth forest.	Vegetation – Effects on Old Growth
3	The FS proposal will affect streamside areas causing increased runoff pollution.	Vegetation – Effects on SMZs Effects on water quality
4	There will be losses of food sources and shelter.	Effects on wildlife habitat components
5	The FS proposal will cause loss of plant and insect diversity.	Effects on plants and insects

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6	Fire hazard will be enhanced by lower humidity and flammable mass of pine needles, twigs, etc.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
7	The FS claims in public documents and notices that there is no significant impact from the proposed actions is a gross deceit.	NEPA Process - Analysis of effects
8	Alternative actions which are less damaging exist…these must be fully presented to the public before a decision is made.	Alternatives
27 – Bonnie Fyfe Lacy		
1	I am opposed to the Healthy Forest Initiative…one that would allow the Forest Service to increase pine plantations and logging already too prevalent on these our public forests.	General disagreement about need for action
2	Increased burning, and logging with pine seedlings replanted, would not ease fire risks to people or lessen insect problems in the forest.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
3	People who live near the forest may need information about how to make their home environment less susceptible to fire.	Actions to be undertaken on private land
4	A mixed species forest is a deterrent to fire.	Alternatives - Increase hardwood composition to reduce fire
5	A wide streamside vegetated area holds more moisture and dampness than one with the vegetation burned.	Vegetation – Effects on SMZs
6	I believe the proposal is an unsound and unnecessary proposal…the measures threaten hardwoods that provide food and shelter for wildlife.	Vegetation – Effects on hardwoods
7	The FS proposal would cause a significant environmental impact.	NEPA Process - Analysis of effects
8	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
28 – Tim Mock		
1	The Lone Star Hiking Trail is one of our area's natural treasures.	Recreation - Effects on the Lone Star Hiking Trail
2	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
29 – Janice Owens		
1	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	The FS proposal threatens the Lone Star Hiking Trail.	Recreation - Effects on the Lone Star Hiking Trail
3	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
30 – B. McCracken		
1	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
2	I do not support such deforestation and loss of habitat so reckless that it would also destroy the beauty of hiking along the Lone Star Hiking Trail.	General disagreement about need for action Recreation - Effects on the Lone Star Hiking Trail
31 – Kathleen Rose		
1	I want no logging in the national forest nor do I want any logging near the Lone Star Hiking Trail.	General disagreement about need for action. Recreation - Effects on the Lone Star Hiking Trail
32 – Regina Levoy		
1	The Forest Service evaluation that this proposed plan will cause no significant environmental impact seems in this writer's opinion to be a cursory one at best, and reflects neither good sense or good science.	NEPA Process - Analysis of effects in the scoping document
2	There is a…stark contrast between an areas that has been heavily	Purpose and Need for Action –

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	managed (pine monoculture) and an area which has had minimal management. In the loblolly stand, the air temperature was significantly hotter…the ground was covered by dried-out, brushy, thick growth…and provides excellent fuel for fires. The minimally managed forest…was cooler, more humid, and was fairly open at ground level.	Actions would increase fire risk above doing nothing
3	I have seen the persistent practice of clear cutting as being perhaps the biggest culprit in producing abundant fuels for forest fires.	Clearcutting is the reason for abundant fuels.
4	The more frequent use of fire proposed in the HFI could be harmful to the harvestable pines: frequent fire…is not part of the natural ecology and could damage the trees, making them more susceptible to pine borer infestation.	Purpose and Need for Action – Actions would increase insect risk in pine-dominated areas.
5	The Houston Sierra Club has proposed an alternative to consider that is sensible and cost effective.	Alternatives
33 – Pete A.Y. Gunter Big Thicket Task Force – Texas Committee on Natural Resources		
1	The FS has stated that there is no alternative to its own short-sighted proposal. This is not true.	Alternatives
2	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
34 – Christopher Wilhite		
1	It is unclear to me how these actions will actually protect communities from wildfires. Perhaps we will be better off…protecting communities by offering grants to help create a community protection zone between our forests and our neighbors.	Purpose and Need for Action – Actions are not needed to protect adjacent private land
2	It is unclear how much thinning, with respect to board feet, will take place. If thinning was well described and made clear that private logging companies conducted it, perhaps the public would not be so inclined to accept this proposal…the logging contractor will be rewarded for thinning with some of the larger trees. In fact your proposal states that almost one-third of the area that will be thinned consists of older stands with larger trees.	Conduct of scoping – scoping letter was unclear on the volume of merchantable timber to be removed and that logging contracts would be used to achieve the thinning.
35 – Cary D. Kirby		
1	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
2	The FS proposal will kill, wound, and reduce fire retarding hardwoods that provide food/shelter for wildlife	Vegetation – Effects on hardwoods
3	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
4	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
5	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
6	The FS states that alternatives to the proposal have not been identified, and that the proposal will have no significant detrimental environmental impact. However, there will be negative impacts…	NEPA Process - Analysis of effects in the scoping letter
7	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
36 – Arlene Beasley		
1	I strongly oppose the FS proposal. I support the HSC alternative.	Alternatives
37 – Nancy Singleton		
1	I oppose the project…it does not create a healthier forest, nor does it decrease the risk of catastrophic wildfires. Instead, it increases such risk.	General opposition to the project. Purpose and Need for Action – Actions would increase fire risk.

	Scoping Comment	Subject
2	The FS has made a blatant error in stating that there will be no significant environmental impacts caused by implementing its proposal.	NEPA Process - Analysis of effects
3	The FS has shirked its duty to provide alternative approaches.	NEPA Process - Alternatives
4	It has failed to provide the public with sufficient information for the public to make a knowledgeable decision about the proposal.	NEPA Process - Conduct of scoping
5	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
6	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
7	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
8	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
9	The proposal contradicts the FS's own proposal in response to beetle destruction in the early 80s, which stated "grow more hardwoods". FS studies have indicated that certain hardwoods discourage beetle destruction of the forest.	Alternatives – Growing hardwoods will discourage SPB
10	Many studies establish that hardwoods have a fire retardant effect in forests. The current proposal calling for frequent controlled burning eliminates hardwoods and their benefits in protecting the forest.	Alternatives – increase the amount of hardwood in the forest to retard fire. Vegetation – Effects on hardwoods
11	The proposal ignores catastrophic fire data collected in SHNF. Of the past 5 year history, there were 58 fires. Only 3 of those fires were in the "Four Notch " area. This proposal is more of a ploy to log than it is to deal with fire and beetle risk.	Purpose and Need for Action – fire occurrence on the forest does not justify the proposal.
12	The proposal mentions that many private forest lands and structures are adjacent to the national forest, it does not specify where, or how much, which makes it difficult for the public to assess the risk or impact of public fire…effort needs to be directed at public education about "fire proofing" their property.	Conduct of scoping – adequacy of information
13	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
38 and 42 – Robert L. Hooton and Dana Buckley MacInerney		
1	The HFI is really an excuse to allow timber industry logging on and over-burning of our national forests.	
2	The FS proposal will lead to greater fire and insect risk because it creates 4,800 acres of flammable, one species pine plantations.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
3	The FS proposal will kill, wound, and reduce fire retarding hardwoods that provide food/shelter for wildlife	Vegetation – Effects on hardwoods
4	The FS proposal threatens potential future old growth forests by burning and logging in these areas.	Vegetation – Effects on Old Growth
5	The FS proposal threatens streamside forests by burning and logging in these areas.	Vegetation – Effects on SMZs
6	The FS proposal threatens the Lone Star Hiking Trail by burning and logging in these areas.	Recreation - Effects on the Lone Star Hiking Trail
7	The public notice states that alternatives to its proposal have not been identified, and that the proposal will have no significant detrimental environmental impact. However, there will be negative impacts.	NEPA Process - Analysis of effects Alternatives
8	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
39 – James T. Fallon, Jr.		
1	Give serious consideration to the Sierra Club plan for reducing fire and insect risk.	Alternatives

Scoping Comment		Subject
2	Please do not cut or burn any trees in the Sam Houston National Forest.	General opposition to proposed actions
40 – Dr. Charlotte Mueller		
1	This proposal threatens our wildlife and the health of our forests.	Effects on Wildlife
2	The Houston Sierra Club has proposed an alternative to consider.	Alternatives
41 – Lisa Marshall		
1	I support The Houston Sierra Club alternative.	Alternatives
2	I am against logging in national forests.	
3	I have heard that the FS proposal would lead to greater fire and insect risks.	Purpose and Need for Action – Actions would increase fire and insect risk in existing plantations
4	I am against the logging of old growth trees and forests.	Vegetation – Effects on Old Growth
5	As for control burning, I worry about the wildlife and their potential injuries and habitat losses	Effects on Wildlife
6	I am for the Sierra Club proposal.	Opposition to proposed action
7	The HSC alternative also proposes growing a larger number of fire retarding hardwoods in the young / old pine plantations to restore the BCW to a more natural, healthier, forest ecosystem.	Alternatives – grow more hardwoods in pine stands to retard fire.
42 – Dana Buckley MacInerney (see letter 38 above)		
43 – Bruce Miles – Director Emeritus Texas Forest Service		
1	I have reviewed Joe Pase's letter (letter # 2) of June 10 and am in complete support of his recommendations.	General statement of support.
2	The Boswell Creek Watershed is a fitting place to demonstrate sound forest management practices.	General statement of support
44 – Bobby Young – Associate Director Texas Forest Service		
1	The project area lies within the fastest growing area of east Texas. Population growth of 15-25% since 1990. These figures are important since people cause 90% of all wildland fires in Texas.	Purpose and Need for Action – general support for protection of adjacent private property
2	Because of previous SPB outbreaks, much of the area is covered by pine reproduction, which is conducive to the rapid spread of wildfire. Very little prescribed burning has been done…and stands are so heavily stocked that rapid containment of fires is almost impossible. Due to the decreased capacity of State resources, it is imperative that steps be taken to reduce fuel loading in proximity of developed areas.	General support for project.
3	The management of smoke for prescribed fire will also be critical in this populated area, also in close proximity to Houston airports. This will require close monitoring of weather, coordination between agencies and partners, and a considerable public education process.	Air quality – smoke management requirements during prescribed burning
4	Mechanically thinning trees prior to prescribed burns will significantly reduce the risk of crown fires and make the burns more manageable.	General statement of support for thinning

ISSUES WORKSHEET

Boswell Creek Healthy Forest Initiative

Sam Houston NF

Issues	Relevant/ Not Relevant to Effects	If Not Relevant, Rationale to Eliminate Detailed Discussion	If Relevant, General Analysis Strategy
1. Forest Vegetation Composition and Structure • The effects that prescribed fire would have on the desired future condition of vegetation in Streamside Management Zones (Management Area 4). • The effects of actions on other structural components of the forest including snags and down woody material. • Changes in forest structure – whether actions will create or perpetuate vegetation consistent with the Ecological Classification System.	Relevant		Report for Project File; disclose results and conclusions on effects in EA.
2. Effects on Erosion Potential and Water Quality • The proposed activities may have effects on the the potential for erosion and sedimentation of streams.	Relevant		Report for Project File; disclose model results/conclusions on effect in EA.
3. Threatened, Endangered and Sensitive Species • The effects of project activities on Red-cockaded woodpecker habitat. • The effects of thinning on the potential for pine plantations to produce nesting habitat in the long-term.	Relevant		Report for Project File; disclose expected results and conclusions on effects in EA.

4. Recreation • The effects of the proposed activities on the scenic quality and use of the Lone Star Hiking Trail.	Relevant		Report for Project File; disclose results and conclusions on effect in EA. Consider: Miles of LSHT impacted by prescribed fire action
5. Wildlife Species and Habitat • The effects of the project actions on habitat for the eastern wild turkey. • The effects of burning on cavity-dependent wildlife species • The effects of burning on mast-dependent species.	Relevant		Report for Project File; disclose results and conclusions on effect in EA. Consider: Effects on MIS.
6. Wildfire Hazard/Forest Protection • The effects of the proposed actions on fuel accumulations adjacent to private land. • The effects of prescribed burning and thinning on future wildfire hazard and predicted fire behavior due to changes in forest structure to more open conditions.	Relevant		Report for Project File; disclose results and conclusions on effect in EA. Consider: Post-treatment fire behavior predictions.
7. Air Quality/Smoke Management • The effects of prescribed burning on air quality. • The effects of smoke on sensitive areas such as nearby urban areas, major highways, and airports.	Relevant		Report for Project File - discuss the effects on NAAQS and mitigations to manage smoke. Disclose model results and conclusions in EA. Consider: Expected smoke emissions and effects on NAAQS.
8. SPB Hazard The effects that thinning and burning would have on future SPB hazard.	Relevant		Report for Project File; disclose results and conclusions on effect in EA. Consider: Acres of high SPB hazard

			stands to be thinned.
9. Old Growth Forests • The effects of the proposed actions on sites identified as potentially providing future old-growth.	Relevant		Report for Project File; disclose old-growth evaluations and conclusions on effect in EA. Consider: Acres that meet the 4 criteria for old growth in the Plan App. I, Supplement #1.
10. The effects of roads on fire starts and suppression effectiveness. The forest needs to do a Roads Analysis when management actions are proposed.	Relevant		Report for Project File; disclose old-growth evaluations and conclusions on effect in EA. Consider: Total Miles of Road Miles of Forest Service System Roads Miles of FS system open roads. Road management actions 1. road improvement 2. road decommissioning 3. road closures 4. changes in road maintenance level
11. Fire Regime • The prescribed burning regime resulting from the proposed action does not represent natural fire frequency and seasonality.	Not Relevant	The burn interval for the areas included in this proposal is consistent with direction in the *Plan*. The *Plan* provides for a two to five year burning cycle within Management Area 2. The *Plan* allows prescribed fire in MA-4 to enhance riparian vegetation or wildlife habitat (see MA-4-31, p. 155). The issue is a forest planning issue and outside the scope of the proposal.	
12. Forest Pest Management • The indirect effects that proposed activities may have on SPB hazard	Not	The basic assumptions with the issue of SPB hazard are: 1.Prescribed fire would eliminate	

due to vegetation effects.	Relevant	hardwoods, either causing pure pine stands to develop or exposing the existing pines to SPB attack, increasing the potential for losses to SPB; and 2. By increasing hardwood composition in the existing stands, SPB hazard would be reduced. SPB hazard is a function of stand composition (the mix of pines and hardwoods), stand age, and density (the number of trees per acre). Prescribed fire of the kind anticipated in this project would not significantly affect larger hardwoods. SPB hazard is dependent on total basal (both pines **and** hardwoods). Simply adding hardwoods to stands where the SPB hazard is already high would increase the hazard, not decrease it. The issue is conjectural and not supported by scientific evidence.	
13. Compliance with the National Environmental Policy Act • The scoping letter has "pre-judged" the effects of the proposal because it states "we do not expect significant effects". • The conduct of scoping is inadequate because the public was provided inadequate information on which to comment. The way the scoping letter was written discouraged public involvement. • Cumulative effects were not considered in the scoping letter.	Not Relevant	The scoping letter presented the proposed actions to the public along with the reasons they were needed. Based on past experience implementing identical activities across the forest, the ID Team, in their preliminary discussions, did not identify any resource effects that would have required the preparation of an Environmental Impact Statement. If significant effects had been expected, the Forest Service would have initiated the preparation of an EIS. The analysis of effects	

• Alternatives to the proposed action must be considered that include actions identified by the public in scoping.		has not been completed prior to scoping the project with the public. Project effects will be disclosed in the EA and specialist reports in the project file. The purpose of scoping is to present a proposed action so that interested and affected agencies, organizations and individuals can provide comments to help to refine the issues, identify an interdisciplinary team, establish analysis criteria, and explore possible alternatives and their probable environmental effects. Cumulative effects are not required to be addressed at this early stage of analysis but will be addressed in the EA and specialist reports. Alternatives will be developed based on the significant issues identified by the Interdisciplinary Team and approved by the Responsible Official who makes the decision on the project. The alternative actions proposed by the Sierra Club will be considered and alternatives that implement these actions will be fully developed if they meet the Purpose and Need for the proposal, are consistent with the *Plan*, and result in meeting the Plan's desired future conditions for the areas involved. (see the Analysis of Sierra Club Alternative Actions, attached)	
14. Compliance with the Forest Plan • The activities proposed are not in compliance with the Plan because:	Not Relevant	The actions are consistent with direction in the Plan specified in the Forest-wide standards and	

1. The proposed change in management regime is a significant departure from overall strategies laid out in the LRMP and should require a revision. 2. The proposed treatments are silvicultural applications which are used to accelerate the production of salable forest products…a de facto reallocation of the site to an accelerated timber production category…the move would in fact require an amendment or revision to the LRMP.		guidelines as well as the standards and Guidelines for Management Areas 2 and 4, which comprise the areas on which the activities would occur.	
15. Management of the NFGT for monocultures of pine. • Agricultural burning for commercial monocultures versus ecological burning. • Effects on diversity of the forest as the result of the pine management emphasis.	Not Relevant	The intent of the proposal is to prescribe burn the areas consistent with the ecological role of fire to produce the desired future conditions set out in the *Plan*. This issue is outside the scope of the proposal.	