United States
Department of
Agriculture

Forest Service
Southern Region

Comments and Responses Appendix K Final Environmental Impact Statement (FEIS) for the Revised Land and Resource Management Plan

National Forests & Grasslands in Texas

1996

How to Use Appendix K

To determine who made a specific comment – for instance the comment from Letter 1409 on page 108 of this appendix. Use the first list, List of Commenters by Letter Number.

To locate comments by the writer's name – Use the second list, Alphabetical List of Commenters, to find the writer's name, letter number and issue codes assigned to that letter. Use the Table of Contents to find the page number of the issue code. Then scan that topic group for the letter number.

Appendix K - Environmental Impact Statement Comments and Responses

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INTRODUCTION

This appendix presents comments - from the public, private industry, and governments - that are related to the Forest's draft versions of the Revised Plan and Environmental Impact Statement.

The Draft Environmental Impact Statement for the Revised Land and Resource Management Plan (DEIS) and the draft Revised Land and Resource Management Plan (Draft Revised Plan) were filed with the Environmental Protection Agency during September 1994. Public notification of the availability of the DEIS and Plan was made during the same week and through mass media, legal notices, and personal contacts. Based on these notifications, the public was invited to comment on these documents through December 15, 1994.

The Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act of 1969 (NEPA) are located in 40 CFR 1500-1508.28. Section 1503.4 provides that "All substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement...".

We used a variety of methods in bringing these documents to the attention of interested persons. The methods included distribution of published documents, news releases, public meetings, open houses, and contacts with organizations, cooperators, local government bodies, and Forest Service employees. Table A-1 in Appendix A contains a list of the public meetings and open houses held during the revision effort.

Two hundred copies of the DEIS, DEIS Summary, DEIS Map Package, DEIS Appendix D, and the Draft Plan were mailed to key organizations, agencies, and individuals. An additional 300 copies of the DEIS Summary were mailed to individuals. Copies of all documents were available at the Forest Supervisor's Office, Ranger District Offices, and the libraries listed in the table on the following page.

The deadline for comments on these draft documents was December 15, 1994. The Supervisor's Office received 1,836 letters postmarked by this date. Letters postmarked after the deadline were reviewed, but not formally acknowledged or included in the FEIS. All letters of comment to the DEIS and Draft Revised Plan are available for review at the Supervisor's Office, Lufkin, Texas.

The letters were logged into an ORACLE data base and then sent to a Comment Analysis Team. The Comment Analysis Team read the letters in their entirety. The different comments were assigned an issue code. After all comments in a letter were assigned issue codes, the comment was entered into the data base. They were then forwarded to the appropriate Planning IDT members for response.

In Part II, letters signed by representatives of State or Federal Agencies or elected officials are reproduced. The reproduction of these letters is in compliance with requirements of NEPA [42 USC 4321 (note)], section 102. The Act requires that "copies of... the comments and views of the appropriate Federal, State, and local agencies, which are authorized to develop and enforce environmental standards, shall be made available to the President, the Council on Environmental Quality, and to the public...".

The Forest Service Environmental Policy and Procedures Handbook (FSH 1909.15), Section 24.1, number 3, provides that "As a minimum, include in an appendix of a final EIS copies of all comments received on the draft EIS from Federal, State, and local agencies and elected officials". Comments from these letters are included with all other comments in Part II

LIBRARIES WITH COPIES OF DOCUMENTS

LOCATION	LIBRARY NAME
Alvord	Alvord Public Library
Austin	National Archives/Records Administration, Lyndon B Johnson Library & Museum
	University of Texas Libraries
Beaumont	Lamar University, Mary & Jon Gray Library
Bonham	Bonham Public Library
Carthage	Panola Junior College, M P Barker Library
Chico	Chico Public Library
Cleveland	Austin Memorial Library
College Station	Texas A&M University, Sterling C Evans Library
	Texas Forest Service Library, Texas A&M University
Conroe	Montgomery County Library
Crockett	Crockett Public Library
Dallas	Dallas Public Library
	Southern Methodist University, Central University Libraries
Decatur	Decatur Public Library
Denton	Denton Public Library
Diboll	T L L Temple Memorial Library
Hemphill	J R Huffman Public Library
Honey Grove	Honey Grove Public Library
Houston	Houston Public Library
	Rice University, Fondren Library
	University of Houston, M D Anderson Memorial Library
Huntsville	Sam Houston State University, Newton Gresham Library
	Huntsville Public Library
Jasper	Jasper Public Library
Ladonia	Ladonia Public Library
Lufkin	Angelina College Library
	Kurth Memorial Library
Montgomery	West Branch Library
Nacogdoches	Nacogdoches Public Library
	Stephen F Austin State University Library
Pineland	Arthur Temple Sr Memorial Library
Prairie View	Prairie View A&M University, W R Banks Library
The Woodlands	South Regional Library
Willis	Willis Public Library
Woodville	Allan Shivers Library

LIST OF COMMENTERS BY LETTER NUMBER

1 Leslie Ramirez
2 Daniel T Davis III
3 S Alan Skinner, PhD
4 Hope Salmon
5 Mary Jo Stegman, USFWS
6 Dr George H Steed
7 Helen Meistrich
8 Marilyn Crane
9 R Bruce Perry
10 Connie B. Alexander
11 Elizabeth McCarty
12 A K Stokley
13 Karen S Stoley
14 George W Goloby, Jr.
15 Cynthia A Prehmus
16 Theresa J. Wyatt
17 Lorna G. Felton
18 Winnie Burkett
19 Margaret H Jones
20 Richard Herman
21 Clarissa Kay Bauer
22 Dave Ellisor
23 Sarah Duck Loudermilk
24 Marion Charles
25 Robert L Gallaway, Jr
26 Mrs. R. B Willman
27 James W Hatchett
28 Laura A. Singleton
29 Dorothy O Stigler
30 Julia M Cosgrove
31 Joan Brummett
32 Robert H Lever
33 Ellen Mayou
34 Sandra D. McClain
35 Irea C Sosa
36 Laura Hefner
37 Esther M. Baker
38 Kay Bell
39 Robert B. Mahley
40 Keith Kingdon
41 Brian W Hefner
42 Curtis F. Cole
43 Dale F Hoagland
44 Paul Woodcock
45 John R Reece
46 Sam W Armstrong
47 James A Null
48 Taylor Mayon
49 Marilyn E. Hulett
50 Ken McClain
51 Rick Hawthorne
52 Dusty Roberts
53 Judith E Rexer
54 Maria R Borg
55 Allen & Jane Thomas
56 Martha S Lanier
57 John Chirafis
58 Carol E Lee
59 Jerome A Moore
60 Debbie Laird
61 F Nowell Jones
62 Marlys J. Becker
63 R. G Markeloff
64 W P Beal
65 Christine Jackson
66 Noragene Hackney
67 John S. Janks
68 Nancy S. Robbins
69 Billy W Hallmon
70 Shawn Toole
71 Peter O Kircher
72 Diana Vandel
73 J. W Sifford
74 Joe C Truett
75 Brent & Jan Helm
76 Janet Valenza, Ph D
77 Cecelia M Donaldson
78 Leland W K Chung
79 Donald L Purinton
80 Ronald J Diver
81 Pat Talley
82 Paula Easton
83 Raphael Sher
84 G. K. Sprinkle
85 Lawrence Branam
86 Martha Branam
87 E M. T O'Nan
88 Marion Holt
89 Gretchen Mueller
90 Mrs Roger Montgomery
91 Diane L Statham
92 Clara F Gregory
93 M E Gillette
94 Ken Womack
95 John W. Hall III
96 Gwen W Robberson
97 Mrs. Jessie Mae Hawthorne
98 Evelyn Erickson
99 Sam Catter
100 William T Snypes
101 Maria Chamberlin
102 Ann Kleiman
103 S Lee Stone
104 Constance Matusiak
105 Joan C Covici
106 Michael B Pfeil
107 Lillian Jean Holt
108 Marilyn Lasof
109 I. Geo ?
110 Martin Giesbrecht
111 Thomas C Randall
112 Mark L Hogge
113 Veronica A Hogge
114 Tom Kemper
115 Peter D Yannet
116 Mary Ella Whitworth
117 Rick Cook
118 James M Lemon
119 T Davis
120 Claudia Hubbard

121 Dolores McNiel
122 Irene Larter
123 D A Corson
124 Page S Williams
125 Dennis Krlieger
126 Cheryl Schutt
127 William P Moore, M D
128 James Rayburn
129 Ruth Click
130 Maria R Balingit
131 Theron R Norris
132 Jeffrey B Hollis
133 Robyn L Lindsay
134 Frankie D Dillard
135 Helen E. Elkins
136 Carol E Lee
137 Alison Young
138 Stuart Marion
139 Bonnie McNairn
140 John E Gorman
141 Patricia Phalen
142 Jana Swedo
143 Ruth Binder
144 Luke Brandon
145 Nancy K. Loggins
146 Debbie Burnett
147 Celeste Newton
148 Reginald Mills
149 Terry Vinson
150 R. N Hawthorne
151 Clark Walker
152 Karen Villalongin
153 D W Hair
154 Richard D Bebermeyer
155 Andy Post
156 Fred W McDaniel
157 Audrey Malinowski
158 Curtis Clemenson
159 Sarah J Zerr
160 Chris Kennon
161 Celie Matteson
162 John M Olsen
163 Jane E Mace
164 Claudia D Olsen
165 Kate A Olsen
166 Johnnie J Rainwater
167 Gerald Smolinsky
168 Jean Joy Frambes
169 Michael A Havard
170 Don Schobert
171 Stan Groom
172 Frances Wogenstahl
173 Bob Neal
174 Gary Wittenborn
175 Jevi Arsenault
176 Steven Harp
177 Julia Brandt
178 William & Carolyn Hardesty
179 Debra Abbott
180 Maxine Estes
181 Kate Cozzens
182 Frances McNair
183 Paul Breaux
184 Julie Provost
185 Marjorie & Louis Adams
186 Richard B Grant
187 Donna M DiGiovanni
188 Robert S McCauley
189 Carolyn Croom
190 Carlos D Speck Jr
191 Fred A Hurd Jr
192 Catherine Milbourn
193 Jim D Stoker
194 William E Muckleroy
195 Mark Elwonger
196 Rex L Bavousett
197 John G Roschke
198 Mark A Assadourian
199 Jesse H Buels
200 George Avery
201 Sarah L Shaw
202 Teresa A Matlock
203 Helen E Byrne
204 David C Berkshire
205 Deanne Prusak
206 Adrienne Vecchio
207 Dan Rey-Bear
208 Robert M. Larson
209 James A. Xavier
210 Linda Wilshire
211 Hope Organ
212 Sylvia June
213 Larry A Ortiz
214 John D Hines
215 Joe Wilkinson
216 George Spalding
217 Barbara Gubbin
218 William M Wimsatt
219 Rebecca Moss
220 William Ohsie
221 Bernice Clark
222 Carol Price
223 Diego A Castro
224 Anthony Lang Goudeau, Sr
225 Chester F Berryhill
226 Richard Kallerman
227 E. H Bush, Jr
228 A L & Corinne Crow
229 Thomas & Grace Hogan
230 Elizabeth Anne Booth, M D.
231 W. D. Utgard
232 Deborah Young
233 Michael E Patterson
234 Kathy Castro
235 Scott Bader
236 Henry & Louise Berryhill
237 Deborah Kirchoff
238 Sallie Mullins Thompson
239 Beth Bader
240 Mervin R Clouse
241 Betty L Bloomer
242 Janine Kowack
243 Jeremy M Devine
244 Alice E Horn
245 Jean Bothe
246 Jessie M Embry
247 John G. Stalk
248 J M. Thomas
249 David Toner
250 Diana E Houston
251 Anne Donovan
252 Dennis Casserly
253 G P Robb
254 Elanor H McQuarie

255 Gayle Y. Jackson
256 Rose Marie Cintron
257 Joan Hawbaker
258 Hall S. Hammond
259 Betty E. Flowers
260 Bonnie Glasgow
261 Wendell L Smith
262 Karen Long-Desmit
263 David E. Taylor
264 David Welsh
265 Charles W. Harrington
266 Matthew Sacker
267 Carl W Cannedy
268 Hank Kastner
269 Aileen Langston
270 Joel T. Patterson
271 Marika Sardar
272 R. C Jacobs
273 Dorothy Kabisch
274 Claudia Z Williams
275 Thueser Strong
276 Arlene Hoffman
277 Carlton Conley
278 Zoe B. Talley
279 Quentin C Eyberg
280 Frances H. Walters
281 Mary Ellen Thomas
282 Lea Florentin
283 Carrol A. Gury
284 Byron Hood
285 Dan M Craddock, Jr.
286 Jo Ann Wood
287 Sizanne Buckley
288 Dr. A. G Unterharnscheldt
289 Kristen D Truitt
290 Merriwood Ferguson
291 Elaine Puppe
292 Ann B. Dingus
293 Lou Celusniak
294 Curtis Clemenson
295 Eva Marie Walters
296 Jeanne Fukuchi
297 William B. MacAulay
298 Mark Browning
299 Mary Flick
300 Sam Kelly
301 Joseph C. LaJoe
302 Ronald J. Parry
303 Dan Fowler
304 Lana Elms
305 Elena Parmesan
306 Dorothy C Wilson
307 Jeremy Clark
308 Felix D. Guerrero
309 Virginia Griffin
310 Audrey Eskue
311 Sue Russell
312 Tammie Callicott
313 Joan V Webster
314 Debra Armstrong
315 Karen L. Brian
316 Elizabeth Collins
317 Mary C. Bunge
318 Yvonne McDonald
319 Kelly Prendergast
320 Jill Bedgood
321 Michelle Endlich
322 Jon Dunn
323 Linda Hartzog
324 Mark R Kehoe
325 James R Barnes
326 Jeannette Klemola
327 Robert A. Behrstock
328 Mary A. Bauer
329 Barbara K Seynaeve
330 Carey Porter
331 Howard Patton
332 Russell Jewert
333 Halcyon R Learned
334 Elizabeth A Klumb
335 William W. Willey III
336 Dr A D. McInturff
337 Victoria & Mark Varley
338 Dr. Emil & Joan Crow
339 Joseph C Steinbach
340 Garry Brunson
341 Dorothy Mueller
342 Wayne C. Sellers
343 Niles Seldon
344 Frances G Smith
345 Claire P Caudill
346 Sandra B Hoover
347 Nancy Kay Davis
348 Thomas J. Zawiza
349 Jerry L Mornsey
350 A J. Dodson
351 Joyce G Martin
352 Waldo N. Townley
353 Carl Chudy
354 William Schriever
355 Carol L. Marshall
356 Cheryl Verner
357 Jos Robert Deshayes
358 Enid C King
359 Elgin Matthews
360 Richey H Clunn
361 Elizabeth G Willis
362 C A. Morgan, Jr
363 Rebecca C Bender
364 Carroll L Campbell
365 Alan Allen
366 Judith Aronow
367 Debbie Allen
368 Carol Crabbe
369 Debra M Weaver
370 Linda Lang
371 Marlene Smith
372 F Perry
373 Daniel R Dinkler
374 Christine Magalhaes
375 Marion D Peace
376 Mark Kulstad
377 Joyce G Simmons
378 Mimi G Cohen
379 Margaret Atmar
380 Nathan K. Pemberton
381 Rosetta Fatherree
382 Ryland E Dempster
383 Fred White
384 Susan H. Billetdeaux
385 Alicia Lopez
386 Maxine Johnston
387 Saul Aronow
388 Gerry Doyle

389 Margo Holst
390 Abhay Anello
391 Wilbanks & Joanne Smith
392 Mary E Mayer
393 Steven A Watters
394 Thomas R Fine
395 Kathryn Celestine
396 Ann Franklin
397 B Minyard
398 C. K. Stephenson
399 Tim Gillespie
400 Patricia Lambert
401 Robert Johnston
402 P Chapman
403 Daniel Hu
404 Heinz E Voss
405 Barbara L Osburn
406 Seth Mazze
407 Maureen F. Ammons
408 Melody Putham
409 Gillian Pearsall
410 David Porter
411 Marie Kaderabek
412 Robert W. Forster
413 James Motheral
414 Keith C Hansen
415 Angela Nunez
416 Sharon K Leber
417 Marianne Pape
418 Michael Stelling
419 Alma Gonzales
420 Ramona J. Rhines
421 Erik Kulstad
422 Cat Carpentier
423 Teresa Hall Coleman
424 Babette B. Harding
425 David Levoy
426 Carolyn Goldman
427 Dean A Phelps
428 Patrick McArthur
429 Tanya Pene McArthur
430 Sheriton Burr
431 Fred A. Hurd Jr
432 Laura A. Singleton
433 Lisa Lambertz
434 Clayton Brazier
435 Caroline Alexander
436 Marilyn G McGill
437 M. Clay
438 Ashleigh Howells
439 Morgana Atchley
440 Judy S. Eager
441 Yvonne Bailey
442 Jeffery Timmons
443 Louise Anzalone
444 Christine Luksza
445 Jim Butler
446 Margaret F. Price
447 Virginia Holden
448 John C. Ashton
449 Eugene F. Rouse
450 Flo Hannah
451 Dan H Hinds
452 Robert W. Houghton
453 Charles M Mount
454 Lauren Irwin
455 Carol Montague
456 Kay Hobbs
457 Shirley A Gibson
458 Ellen Brown
459 Thuy Huynh
460 Dung Vu
461 Stephanie St. John
462 Douglas Pierre
463 Wang Shein
464 Karen S Sherman DVM
465 David Sykes
466 Paul A. Block
467 J Craig Gladman
468 S. Scott Bell
469 Barbara N. Campbell
470 Laurence Cowles
471 Margarete Egan
472 Barbara Bernett
473 Tommy Elder
474 Barbara Baxter
475 Hunter P. Harris Jr. MD
476 B L. Russell
477 Jennifer Hadley
478 Amish Shah
479 Meg Byerly
480 Hanh Nguyen
481 Blythe Janowiak
482 Earlene Morton
483 Anne Ness
484 Christie Thao Vu
485 Richard M Rousseau
486 Erin VanBergen
487 Rommel Cruz
488 Edward A. Montez
489 Leticia L Anderson
490 Don Griffin
491 Larry L. Hutchison
492 Virginia Anderson
493 Ann Richey
494 Judy Ladd
495 G. Stephen Harding
496 Christine Lam
497 Melissa Reaux
498 Jeanne Jacobsen
499 Jackie Stagen
500 Jennifer Mendel
501 Bela Shah
502 Forrest Arnold
503 Bill Wiener, Jr.
504 Donald M Johnson, Sr
505 Greggory K Smith
506 Walter Johnson
507 L W. Sleigle
508 Mark A. Parker
509 Micheal E Calloway
510 Laurie Friddle
511 Gwen Wood
512 Mary Richards
513 Kathryn L McGuffin
514 Michael S Logan
515 Eddie N. McGuffin
516 Verlo Strond
517 Kristin Hobbs
518 Larry Cheatham
519 Mario Anzaloro
520 Jeff Hutton
521 Lee A Richardson
522 Jeffrey Scott Wilson

523 Virginia L Courtney
524 June C Stacey
525 Lyle G Seaver
526 Carol Weaver
527 Elizabeth Ward
528 Donna J Burrows
529 Peggy Smith
530 W G. Schmidt
531 Ray Conley
532 Anna Rosewagner
533 Melanie Straiton
534 Doris B Barr
535 Celia Morgan
536 Bubbie Barber
537 Douglas E. Tullar
538 F. H. Walters
539 Norman P Gregas
540 Michael J. Richards
541 Jonathan A Pierce
542 Cynthia Ann Schultz
543 Pauline Frank
544 Dorothy J Reynolds
545 Joan Newman
546 Mary Lee Supulver
547 Lou Baggett
548 Dorothy M Leslie
549 Bonita Bowman
550 Emma Ray Williams
551 A D Nordhem
552 B. A Oldfield
553 Lon Turnbull
554 Hampton Jones
555 Don E Lukehart
556 James A Smith, Jr.
557 Dallas White
558 Pat Brothers
559 S. M. Gardner
560 Heidi M Davis
561 David F. Fox
562 Becky Schoelman
563 Amy Rundel
564 Elizabeth Ferbert
565 Ronald L Schoenewolf
566 Janice E Catt
567 Waldo W. Townley
568 Luciano O Oviedo
569 Dan Bennett
570 John M Nordgren
571 Scott K Anderson
572 Betty B. Teats
573 Janet Kepner
574 R P Gallanto
575 Barbara A Dell
576 Rosalyn S Forster
577 Elaine H Maas
578 Darlene M Popper
579 Sharon Heldenbrand
580 Shirley Mondshine
581 Mary Glover
582 Isabella Quoyeser
583 Bonnie Bailey
584 C Jane Thompson
585 John L Tveten
586 Frank D. Hankins
587 Kenneth & Louise Martin
588 F R Brotzen
589 William E Faucett
590 James M Gerson
591 Sharon Miller
592 Reginald Mills
593 Helen J Boone
594 Susan Christmas
595 Larry Michael Hall
596 Tara Farmer
597 Jennifer Ferguson
598 Benjamin L Loden
599 R L Booth
600 James Roberts
601 Melanie Conaway
602 Marvin J Sebastian
603 Robert Martin
604 Chuck Bach
605 William Manis
606 Annice Butler
607 Rose Iovannone
608 Ann E Hicks
609 Christian V Wolff
610 Edie A Booth
611 George Mullikin
612 Adrienne Vecchio
613 Richard Goldfarb
614 David G. Duff
615 Ray Young
616 James E Ohman
617 Tim Maher
618 Bobby Wilson
619 Mrs. Barclay Megarity
620 D O ?
621 John W. Oakley
622 Ruth A Jameson
623 Margaret Footit
624 Michael E. Footit
625 Stephen Scherer
626 Robert W Hill
627 Gordon W Smith
628 Jame S Wilson
629 Peggy Wilkinson
630 Robert Francis
631 Marybelle Cooper
632 Elizabeth Cross
633 Jeffrey C Hoyt
634 Nancy Landau
635 Melissa May
636 W. C Redding
637 Donald M Gray
638 Vicky Rofkahr
639 Jeremy Vicars
640 Rie Congeho
641 Leland S Day, Jr
642 Joel West
643 Lorrie Campbell
644 Jon Wilson
645 Uyen Le
646 Marianne Armstrong
647 Rebecca Burroughs
648 Henry Peck
649 Paulette L Cleveland
650 Jay Kopycinski
651 Jack Ellard
652 Ray Galett
653 Tim Mock
654 Barbara Despres
655 Robert Perry
656 Richard M Rice

657 Lee Swords
658 Ralph G Blakesley
659 Janice Pratt
660 Donald R Ridder Jr
661 Gregory M Knopp
662 Penny E Lindsey
663 Ronnie Carroll
664 J Chris Quoyeser
665 Mike Denson
666 Raymond Rowlett
667 Debbie Mueller
668 Calvin R Blakley
669 Lynn B Zeigler
670 Darlene Miller
671 John Baird
672 Jean McClintic
673 Don Teter
674 Connie F Blakley
675 Linda House
676 Mrs R B. Willman
677 Elizabeth Hansen Crouch
678 Ed Kottwitz
679 Betty M Smith
680 Carol Edwards
681 Pam Walker
682 Patricia Glover
683 Thomas C. D Paolo
684 Don W. Day
685 Marina Firestone
686 A V. Emmott
687 Julia T Dill
688 Anne Pearson
689 J M. Berchey
690 Stephen Miller
691 Avis M. Brister
692 Kermit Kippen
693 Nancy Banul
694 Clark Terrell
695 Mary Kathryn M Clay
696 Diane L Fodrey
697 Carol M Leonardon
698 Pamalla K Moes
699 Jane E. Mace
700 Ronald Blackshear
701 Patricia Lyon
702 Kathryn Gruetzmacher
703 Roger Breedlove
704 Rodney K Crow
705 Kenneth Hawkins
706 Guadalupe Chavez
707 Linda K Hurley, PhD
708 Wynn A Wilson
709 Glenda Goehrs
710 Cathy J. LaFountain
711 John A Whittle
712 Joyce Hope Jarmon
713 Lance Horst
714 Katherine Kitchen
715 L G Bland
716 F F. Willingham
717 Brian Smith
718 Teresa Brueggen
719 Lana Edwards
720 Dan S Culver
721 Mary Alice Mehaffy
722 Donna Piercy
723 Michael Begley
724 Cynthia Jacob Dunigan
725 Stacy Williams
726 Mary Sue Williams
727 Kirby Williams
728 Kevin Williams
729 Jim Kassanoff
730 Anne Stafford
731 Mike S Dunigan
732 James E Day
733 Joaquin B Gonzalez
734 Josephine Briggs
735 Joan G Gambill
736 Alene Wright
737 Billie Clary
738 Peter A Barnard
739 Claud Payne
740 B K Schenker
741 Richard Hillman
742 Mike Coker
743 Carol Vallejo
744 Cynthia Grady
745 Richard Westn
746 Connie Meredith
747 Mary W Tigner
748 Geri Ross
749 Judy A Morris
750 Nyal Walker
751 Louise Danie
752 Ona G Baker
753 Thomas M. Flowers
754 Sandra B Rapoport
755 M Camille Vardiman
756 Beth Street
757 Wendy Wingfield
758 Peggy Rozell
759 Toni Miles
760 Katharyn D. Reiser
761 Cynthia Nimmons
762 Joseph D Chodrow
763 Pat Weems
764 David L Waters
765 Stephanie Wise
766 Robert Stewart
767 Nita J Gokey
768 Barbara Vollweiler
769 Patrick T Burke
770 Chester F Berryhill
771 Robert Demaree
772 Matthew Jay Tafoya
773 Errol R Oguzhan
774 Robert Panzarella, M D
775 Rosemary Bruner
776 Lawrence M Baldauf
777 Paul J Gregor
778 Bryan L Crouch
779 Paul C. Johnson
780 Isabella Bjerring
781 James L. Knight
782 Michele Rocky
783 Marjorie Dearmont
784 Frank R Klune Jr
785 Margaret A Gilbert
786 Linda Berthelsen
787 Katie Best Butler
788 R. L Claussen
789 B J. Griffin
790 Margaret W. M. Hansen

791 Annalynn C. Cox
792 Michael Strong
793 Carolyn Goldman
794 T. Lunstroth
795 Rob A Rangel
796 Carol Orgin
797 Robbie Norman
798 John M. Graves
799 Michael Redman
800 Wes Satterlee
801 Richard Orellana
802 Joseph G Coram
803 Andrew J Page
804 Mike Wolf
805 Bruce W. Mills
806 Sean de Vega
807 Larry Pelty
808 Susan ?
809 Sean D. Graves
810 David O. Adams
811 Michael Ratcliff
812 Dawn Russell
813 Pat Hadipour
814 Jane Meyer, O P
815 Sr Mary Magdalen Hanel
816 Kathy Freeman
817 Diane Simmons
818 Frederick B Thawley
819 Desiree Yavone Cable
820 Donna Whitsett
821 Jeffery K. Holderfield
822 Skip Ward
823 Paula Ambrosy
824 K Chaney
825 Amy Lagrimanta
826 M. Cristina Diaz
827 Greg Turetzsky
828 Wilhelmina Marquart
829 Abe Royster
830 Allan Muenzler
831 Cynthia Green
832 Glenn D Fisseler
833 Cheryl D. White
834 Milton R. Hughs
835 J R Woodward
836 An Hoang
837 Marc Finley
838 David Goss
839 Judith Cox Mathis
840 Sally King
841 Will & Jan Riser
842 Mary Ruth Craven
843 J R Kyle
844 Debra Gholson
845 Karen J Hirsch
846 William E Skiba
847 Patricia Wise
848 Bert Golding
849 Ruth Heino
850 I. Sandra Elsik
851 Chris Freisenbruch
852 Kurt Malmquist II
853 Ann Marquart
854 Elizabeth Nederman
855 Clarence W Donnelly III
856 Margaret Parker
857 Bob Phillips
858 Richard C Dutch
859 B A Thurston
860 Mrs D L Whitney
861 Marvin Noble, M.D
862 Eddie Jean Kriedeman
863 D. K Waller
864 Mrs. Robert E. Martin
865 Thomas Wilson
866 Sandra J. Pfaffenberger
867 Elaine Colwell
868 James W Coffey
869 Rita J Lomax
870 Bonita Walker
871 Julianne S Grunenwald
872 Walter M Evanoski
873 Patricia Ann Lyons
874 Scott Towns
875 Dolores A Allen
876 Michelle LaRose
877 Bonnie Stech
878 Richard G Stanley
879 Janet DeRidder
880 Mitch DeRidder
881 Barbara Duryea
882 Jane E Dodge
883 Elizabeth Martin
884 Cheryl Bowmer
885 Mayan Rembert
886 James C Hoskins II
887 Ed Keely
888 Earl Fisher
889 John Hollingshedd
890 Leticia Rosales
891 Bruce Keenan
892 Donald Purinton
893 Earl A Labuga
894 Peter D Kennedy
895 John W. Buckman
896 Colleen R Lamos
897 Tami Knight
898 Bette Lising
899 R Clayton McKee
900 Cornella Williams
901 Irving Greenbaum
902 James T Ivy
903 D Rutowsky
904 David Crabb
905 Stacey Harrell
906 Marcy M. Frantom
907 Jennifer A. Bowers
908 Carole Plumb
909 Shirley Eller
910 Patricia Cauthen
911 I L Larter
912 Susan Crabtree
913 J. David Hines
914 Mary Ellen Thomas
915 Danielle P. Huddle
916 Mary Pedroza
917 Kenneth G. Weir
918 Linus Louis
919 Louis A Biles, Jr.
920 Jeremy Sheffield
921 Karen Gregory
922 Ernest Bailey
923 Shelley L. Greene
924 Steve Smary

925 Bonnie Howe
926 Elizabeth Weston
927 Cheri H Urban
928 Rex L Bavousett
929 Richard Bryarly, Jr.
930 Julia M Bednar
931 Kevin Johnson
932 David Marsh
933 D. Levi
934 Juan Navarro
935 Bettye Gardner
936 Paulette L Cleveland
937 Betty B Kirby
938 Bechir Abbassi
939 Bob Dale
940 Mychele Lord
941 Judith D Creasy
942 Johathan Roman
943 Nidhi Trehan
944 Walter Wikes
945 Jamie P. Smith
946 Michael Strong
947 Mark School
948 Catherine Curby
949 Ola B. Humphries
950 Maria C. Richards
951 Beverly McLaughlin
952 Luean Anthony
953 Georjean Sherriff
954 Pat Talley
955 Linda Merrill
956 Ginny Gilbreath-Fienga
957 Aubrey R McKinney
958 Kenneth P Beard
959 Timothy K. Perttula
960 Dan Sell
961 John Head
962 Chris Elwood
963 Carla Ortiz
964 Pat Dunn
965 Donnie A Tow
966 Steve Jessup
967 Carolyn Joseph
968 Diana R. Johnson
969 Kelly Spiller
970 Madge O'Brien
971 George D. Walker
972 Jo Luster
973 Vivian Hill
974 Heidi McNeil
975 Paul D Klippel
976 Audrey a Micheletti
977 Blanca N. Salinas
978 Patricia G. Kaye
979 Dennis J Stanek
980 Takuya Sakuraba
981 John Kovar
982 Bessie G Cornelius
983 Luke Brandon
984 Charles McCabe
985 Leslie Ann Billings
986 John M. Fuqua, Jr
987 Nancy C. Flatt
988 Robert N. Flatt
989 S David McKenney
990 Leon Adickes
991 Bruce R Miles
992 C N Adams
993 Ramon McKinney
994 Marty Howell
995 Harvey Natevrn
996 Wanda Henao
997 Rue Lynn Allen
998 Robert O Scott
999 Christopher S Everett
1000 Janice Withers
1001 Gail S Cely
1002 Arthur E. Travis Jr
1003 Mike Stepchiski
1004 Edward Ramirez
1005 Loren Fleckenstein
1006 James K Garde
1007 Diann Walker
1008 Richard Fowler
1009 Tommey S. Conwey
1010 Martha Ford
1011 James Ruggerio
1012 Raj Sinkar
1013 Linda Hankins
1014 James R Dean
1015 Mary Lou Fry
1016 Jacqueline Bassett
1017 Jonathan Carrell
1018 Mark Schumacher
1019 N. Susan Stone
1020 David Matthiesin
1021 Brenda Grover
1022 William S Clifford
1023 Zak A Jarnell
1024 William D Wray
1025 Janie Henry
1026 Mr. R. Skarke
1027 E P. Thurman
1028 Helen Hutchins
1029 Paul B Owens
1030 Sonia M. Martinez
1031 Paul E Thetford
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1037 Jenna Scott
1038 George C Onstott, Jr.
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1040 James M. Lieb
1041 Durward P. Hulce
1042 Mary Ann Riss
1043 Joe Devito
1044 Kevin Yeats
1045 K. Suzanne Ricketts
1046 Walt Sunday
1047 Stephen Cole
1048 Anthony Hering
1049 Isabella R Mohr
1050 Edith M Hoyt
1051 Loretta J. Gerus
1052 LaNona Higginbotham
1053 Den Holley
1054 Leon C. Weiss, Jr.
1055 Kathleen Riller
1056 Peggy Evans
1057 Lee McCasland
1058 Stephanie P Smith

1059 Monica Spurlock
1060 Lee Svedeman
1061 Don Piller
1062 Sherlyn Terry
1063 Molly Seay
1064 Charles R Foreman
1065 Matt Hamje
1066 Shirley L Holland
1067 Michael C Rawlins
1068 Bjorn Ahle
1069 Joshua E Lloyd
1070 Joyce Meyer
1071 Karen Brown
1072 R Daniel Turnipesco
1073 Dirk T Burgess
1074 Patricia L. Bailey
1075 Dorothy H Johnson
1076 Retha Jane Woods
1077 Patricia P Weiss
1078 Charles J. Shipman
1079 Judy Cato
1080 Michael B Wortham
1081 Everett Evans
1082 Louis B. Parks
1083 Richard P Massey
1084 Helen Roy Turnipseed
1085 Richard Schiebel
1086 Albert M. Armand
1087 John I. Franton
1088 Gloria B. Franton
1089 Dale R Peters
1090 Judy Attaway
1091 Mary Flick
1092 Lois W Morgan
1093 Bruce Japper
1094 David M Zumbaugh
1095 David Sirbasku
1096 Jennifer Clay
1097 Sandra L Cavanaugh
1098 Betty R Thetford
1099 Jil Budziszewski
1100 M Stephen Lucas
1101 Jane Maute
1102 Ireene Houston
1103 Sara Raiman
1104 Joy Hester
1105 Ramiro Rodrigez
1106 Charlene Bartholomie
1107 Mikie Perroni
1108 Mike Peters
1109 Cordelia A Perroni
1110 Eleanor Roman
1111 Garnet L Cunningham
1112 Kathryn Louie
1113 Rita Leal
1114 Sean Connor
1115 Caroline Alexander
1116 Karen L Thomas
1117 Karen McIver
1118 Rick Shivestrg
1119 Martha J Ohlson
1120 Matt Borneman
1121 H A Thomas
1122 Mike Behrmann
1123 Nina Griffin
1124 Karsten Melcher
1125 Deborah Kliethermes
1126 Janet J Peatross
1127 L James Lester
1128 Paul Tanner
1129 Stacy S Pentecost
1130 Joseph Gelley
1131 Bettye Padue
1132 Barbara H Massey
1133 Ray B Gulick
1134 Lowell E Wade
1135 Tori Coward
1136 Jim Bates
1137 Mary Margaret Floyd
1138 M. Terri Thompson
1139 Diane Brinkmeyer
1140 Shaun J Richard
1141 Alethiea Morris
1142 Eric Ruckstuhl
1143 Marietta Innmon
1144 Lettalou G. Whittington
1145 Dolores Hall
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1147 James H Sims
1148 J Roseaberger
1149 Paul Jetie
1150 Georga Cash
1151 JoAnn Hazard
1152 Holly T Boyle
1153 Larry Hansen
1154 Katherine W. Piper
1155 Annie M Armand
1156 Carley Ann Armand
1157 William B. McAnally
1158 George R Mays
1159 Sally Schott
1160 David Holzmer
1161 Ann Brede
1162 Chalon Mullins
1163 Sandra Peterson
1164 Elaine McCallion
1165 Raymond L. Golitko
1166 Deborah Fisdich
1167 John R Swanson
1168 Betty R Casey
1169 Kristen Keller
1170 Sherman Robinson
1171 Paula Nash Holliday
1172 Patti McGinnis
1173 D J. Butler
1174 Gerald G. Maloney
1175 Nellie M. Archer
1176 Karen A Madderra
1177 Judith Jenkins
1178 Herman Dobbs
1179 Irma Gutierrez
1180 Frances C Peterson
1181 Judy Spurlock
1182 Jennifer Lowry
1183 M A. Breedlove
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1185 Kenneth McCorlel
1186 Rodney J Horn
1187 Steven C Abbott
1188 John Butwid
1189 William J. Burton
1190 Nicole Maddux
1191 Jamie Heavey
1192 Dolores Woodruff

1193 Mark J Jackson
1194 Barbara L Betzko
1195 Christopher Close
1196 Nick Kiddy
1197 Paul D Schultz
1198 Isolde E Kellock
1199 Lloyd W Oliver
1200 Lynda L Arnold
1201 Christine D Persio
1202 T W Bourick
1203 Rose Hernandez
1204 F E Campion
1205 Kerry Townsend
1206 Elaine M Nitschke
1207 Ray B Wetherell
1208 Marcia Jackson
1209 V L Caldwell
1210 David Kramer
1211 Carol Clark
1212 Ross P Kennedy
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1214 Melody Bernstein
1215 Amy Weinhouse
1216 Osama Dawoudi
1217 Matt Bishop
1218 George E. Cauthen
1219 John Michael Stovall
1220 Joe Anne Berwick
1221 Dusty Cheryl Roberts
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1223 Karen Stocktan
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1225 Lornis M Van Loon
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1227 Danny Davis
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1232 Larry Denner
1233 Marjory Van Sickle
1234 M.J Schultze
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1268 Marie Preston
1269 Wilson Braden
1270 Roberta J Smith
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1272 Peter Bowman
1273 Iris Taffel Silvere
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1276 Dawn Borsheim
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1278 Catherine A Rich
1279 Joel Winston
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1281 Mike Pirtle
1282 Robert R Barclay
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1284 C E. Hart
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1286 Ted E. Ryan
1287 Else Knappenberger
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1289 Christopher S Binnings
1290 Celia Sanchez
1291 Anthony P King
1292 Jackie A Pace
1293 Lupe Garcia
1294 Peter Spong
1295 Lamar Wildinson
1296 Jean Stitzlein
1297 Dorris M Bauer
1298 Jayne R Smith
1299 Annette B. Jones
1300 Rita M Flores
1301 Gardiner Roddey
1302 Richard N Evans
1303 Carlita Zummo
1304 Gale Briggs
1305 A L Vawter
1306 June Van Oart
1307 Gary Lou
1308 H.A. (Joe) Pase III
1309 James E. Bruseth
1310 Tom Maddux
1311 Efrain Sandalio
1312 D S Mattiza
1313 Mark Warhol
1314 Linda Shaw Hambric
1315 C D. Sykes
1316 Rupert Holland
1317 Susan E Wingfield
1318 Aimec Lea Palmer
1319 Waneta Doege
1320 Damon Pennington
1321 Julie DeBlanc
1322 Janet McGwamery
1323 Binz DeWalch
1324 Elaine Evans
1325 Willie Allen
1326 Cathy Tavangarian

1327 M Hay
1328 Jane Isaacs
1329 Margaret E. Finn
1330 Joanne Pierrescott
1331 David P. Brown III
1332 Kristina Seller
1333 Mabel H Graham
1334 Johathan Perry
1335 Margrit Woods
1336 Ronnie Wilson
1337 Sally Fisher
1338 Bobby Bin
1339 Christopher Alk
1340 Wendy Leigh Ezernack
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1342 M Coburn
1343 Jeff Mitcham
1344 Courtney McCollum
1345 R V. Garuclem
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1347 Barbara Bernett
1348 David Wilson Young
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1352 Patrick D. Cox
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1354 Suzanne K. Oliver
1355 Carolyn Croom
1356 Noel Pettingell
1357 Linda Tennyson
1358 Urban S Allan
1359 Kay B Cleveland
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1361 Marvin W Smith
1362 Carole Wilmoth
1363 Alice Drake
1364 Pat Wade
1365 Martha Lapierre
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1367 Stephen R Wheaton
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1369 Jerry Curless
1370 D R Brown
1371 Stephen Swartz
1372 Sonia Marcano
1373 Robert P Wiley
1374 C. Zewiwki
1375 Alex Ross
1376 James R Anderson
1377 Rose Yunker
1378 W A Mitchell
1379 Laura E Wingfield
1380 John Cook
1381 Glen Telge
1382 Scott Stallings
1383 Kyle W. King
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1385 Fred H. Wills
1386 Abigail Brown
1387 Hiram P. Arnold
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1393 R Stephen Hillis
1394 John C Hooper, Jr
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1396 Shirley F Hurt
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1398 Eric William Swanson
1399 Lynn E Miller
1400 Wendy Beck Von Peccoz
1401 Michael Honel
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1404 Carol Farmer
1405 Deborah E Buscher
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1407 M. Clifford Mayer
1408 Kathy Cornehl
1409 Margaret Dutch
1410 Gary R Edmondson
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1412 Darline Stoll
1413 Raphael Sher
1414 Raymond Swiatkowski
1415 Holly Kuper
1416 Lori A. Durieux
1417 Ken Kramer
1418 Carol Haase-Greenley
1419 Eric J Van Buren
1420 Tim Kramer
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1423 Rodney Choate
1424 John G Getaeh
1425 Lori S. VandBunt
1426 Russell Fory
1427 Catherine Fine
1428 Esther M Baker
1429 Janie A. Harris
1430 John K Alexandar
1431 Diane L. Statham
1432 Donald L. Benham
1433 Leo A. Reitan
1434 Tom & Marilyn Brown
1435 Joseph Murphy
1436 William W. Willey III
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1438 W Norman Davis
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1442 Thomas L Dixon
1443 Daniel A Davis
1444 Stephen Evans
1445 Henry Horne, Jr
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1447 Jane W Ehoseff
1448 A. Lila Silva
1449 Alana Evans
1450 Tom Groover
1451 Robert M Peck
1452 George & Jeannett Crawford
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1456 Ms B Zimmelman
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1458 Robert Verret
1459 Marlene Tremblay Smith
1460 William Schriever
1461 Bernice Clark

1462 Richard M Browning
1463 David A Todd
1464 Beth Street
1465 James D Chapman
1466 Jim and Betsy Courtney
1467 Al Lide
1468 Jim Stoltz
1469 Barbara King
1470 Kimberly Zaller
1471 Barrie Scardino
1472 R Scott Beasley
1473 Pat Miser
1474 L T Lambertz
1475 Dee Bash
1476 Gina Buelangham
1477 Beverly Karnes
1478 Paul McManus
1479 Donna Diener
1480 Lisa Wathenl
1481 Charla O. McManus
1482 Peggy Head
1483 Nikki Olivo
1484 Robert N Romero
1485 Suzanne C Henwood
1486 Ann Marguart
1487 Michael Miller
1488 V Clay Cauthorn
1489 Ethlrie Barber
1490 Carol M Keister
1491 Nacina R. Piclay
1492 Anna Wilhamson
1493 Weimin Chen
1494 Steve Marterstock
1495 Barbara Inahara
1496 Gary S. Pardue
1497 John W. Rebsrock
1498 Stephanie Strickland
1499 Keith Conarroe
1500 Susan D Goodsen
1501 Margaret A Goetz
1502 Shelley Corman
1503 James A. Muir
1504 Donna & William Ellis
1505 Emily McKay
1506 M W. Resnick
1507 George R. Mays
1508 James E. Ohman
1509 Mary R Newman
1510 Larry G Miller
1511 Larry Reed
1512 Dan & Linda Sell
1513 Ann Salyer-Caldwell
1514 Sandra C Stewart
1515 Teresa T Hajny
1516 Ron McManus
1517 Suzanne Severide
1518 Mary Baily
1519 Susan Belcher
1520 Mara K Dowling
1521 Conie Keller
1522 Jo An Bradley
1523 Frances Barnes
1524 Richard Williams
1525 Martin D Beirne
1526 Craig B Young
1527 Clay Jackson
1528 Randy Cook
1529 Alder Doyle
1530 Albert Wang
1531 Juan Carlos Garcia
1532 Jean Wang Lin
1533 Akif Uzman
1534 James Shimek
1535 Ronnie Williams
1536 Ralph Stivison
1537 Sonny B Lyles
1538 Stanley H. Fharance
1539 Cristy & David Nordstorm
1540 Ollie Young
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1542 Zuley Pruiz Vann
1543 John A. Smegal
1544 Annabel Levy
1545 Aurelio Diez
1546 Alison W Gemp
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1548 Mary B. Duncan
1549 Martha Pulido
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1551 David A Whitesides
1552 Robert L Pendergast
1553 Robert P. Madrulli
1554 Kevin Thomas
1555 Steve Toon
1556 Crista Hansen
1557 Amy B. Cooper
1558 Rebecca J Vandebunt
1559 R M. Gray
1560 Paul Lindberg
1561 James M Braden
1562 Scott Yates
1563 Phyllis Van Kerrebrook
1564 Hank Kastner
1565 William M Gazas
1566 Edward Silha
1567 Gary Romeo
1568 Wayne Schoettle
1569 Eva S. McLeod
1570 Dave Matztin
1571 Gatlin L Mitchell
1572 Sue Fisher
1573 Charles F Smith
1574 Jack E. Bates
1575 Elizabeth Anne Booth
1576 Nick Nickelson
1577 Nancy Brooks
1578 Gary Dearing
1579 Helen Potter Harper
1580 John Brooks
1581 Gary Willey
1582 Ellen Robbins Red
1583 Al Cravens
1584 Shaun Martin
1585 Jack Jennings
1586 James A. Williams
1587 Donna M. Stowe
1588 Rosemary Nicholas
1589 Randall M. Bell
1590 Lilburn A Goodson
1591 Wendy Franke
1592 Mark Franke
1593 John H Sieber
1594 Dorothy C. Wilson
1595 Jack Gartner

1596 Jessica McNamara
1597 Deborah L Sullivan
1598 Robert M Plott
1599 Marilyn Kinney
1600 John Metivier
1601 Robert E Partridge
1602 Bill Ferguson
1603 Deborah B Baker
1604 Edward C Fritz
1605 George Russell
1606 Julie Jeter-Edwards
1607 Becky Stanbery
1608 Bruce W Sieve
1609 Denise Rhames
1610 John W Spence
1611 Bruce McNellie
1612 Ron Hufford
1613 Ray Hooper
1614 Bob Currie
1615 Aaron Higginbotham
1616 Richard C Wright Jr
1617 Bonnie Wright
1618 Gene Borders
1619 Earl G Ussery
1620 W D Bouillion
1621 George Gumberger
1622 Heinz A Gaylord
1623 Clark Walker
1624 David Ford
1625 Beth Bowling
1626 Ellen Mayou
1627 Frank B Shockley
1628 Richard A Walker
1629 Harris Martin
1630 Joe Wells
1631 Earl H Brunham
1632 Larry D Shelton
1633 Todd Nichols
1634 Daymon Rambin
1635 Robert Verret
1636 Norman Young
1637 Carla & Scott Carleton
1638 Scott Carleton
1639 Lois M Rose
1640 Myra La Pierre
1641 Mike Vackar
1642 Bob Windham
1643 Gary Windham
1644 Bennie E. King
1645 Ed Keely
1646 Rebecca and Rusty Cluck
1647 Dennis A Smith
1648 Sedge L Simons
1649 Michael Harris
1650 Matt Howell
1651 Leon E Ray
1652 R Michael Devenport
1653 Don Dickerson
1654 Kenneth N Huete
1655 Ike McWhorter
1656 Johnny A Tobias
1657 Jeff Allen
1658 Lorraine G Bonney
1659 Frank Blake
1660 Jenny Jeffereys
1661 Carla Hassell
1662 Joe D Pumphery II
1663 Lee H Etheridge
1664 Sheila Jackson
1665 Gerard C Edwards
1666 Linda B Wickwire
1667 Mark Mulrooney
1668 John Erickson
1669 Jean Hamil
1670 Susan Schinke
1671 Andrew Sansom
1672 Mark A. Carter
1673 Joseph B Martin, II
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1675 Curt Havard
1676 Lynn Hartt
1677 Floyd A Watson
1678 Carl T Bledsoe, Jr.
1679 Cliff Rushing
1680 Mark Stout
1681 Phillip Chaney
1682 Julie Bell
1683 Jon Trahan
1684 Beth Gunn
1685 Jess G Morales
1686 Kathi Cronan
1687 Sherma Van Riper
1688 Randal M Hall
1689 Kelly Tamlecsley
1690 Brian P Boles
1691 Kendall Tomasso
1692 Mike Bixler
1693 N E Henderson
1694 Z C Hutchinson
1695 A B Rauer
1696 Pirjo Klint
1697 Frank Soltzman
1698 J R Barnett
1699 Stephen A Foote
1700 Beverly W Jordan
1701 Elaine Vondrasek
1702 Sedge Simons
1703 Wanda L Smith
1704 Carla Farley
1705 Naomi Driscell
1706 James Tiebout
1707 Guy Hagstette
1708 David F. Doolittle
1709 Gonlalo Arellano
1710 Frances Perry
1711 Joe Bozques
1712 David Chou
1713 Timothy M. Elford
1714 Lance Duncan
1715 J Susan Smith
1716 W David Tracey
1717 Becky Davis
1718 Kerry Barnes
1719 Bill J Davis
1720 Kayee Halstead
1721 Jesse Wright
1722 Dora M Buzbee
1723 Brandt Mannchen
1724 Jan Dixon
1725 Ann Hope Orlando
1726 R J Parry
1727 Pamela O McCann
1728 James R Jackson
1729 Charles L Miller

1730 Libby Whitmire
1731 Owen and Pat Falls
1732 Margaret Tipton
1733 David K Terry
1734 Chris Hardy
1735 John L Maldonado
1736 David Mildren
1737 Troy R Hough
1738 Kenneth J Oubre
1739 George Rickard
1740 Billy F Feltman
1741 James Vackar
1742 Bill Monds
1743 Barbara Utley
1744 Robert Chote, Jr
1745 Kent Atwood
1746 Robert Gartner
1747 R L Lemke
1748 Douglas Guff
1749 A A Macalusa
1750 Louise Hines
1751 Bob Pette
1752 Gloria Preston
1753 D J Gauger
1754 Carl A Dunn, Jr
1755 Clark Williams
1756 George Andrews
1757 Cecilia McSwain Boles
1758 John R McSwain
1759 S. G McSwain
1760 Ken Boles
1761 J. C McSwain
1762 Cole Hooper
1763 Ronald R Switzer
1764 Cliff Rushing
1765 David Marrack, M D
1766 Tom Rees
1767 Leon F Vann
1768 Robert V Baylis
1769 Eric J Lundquist
1770 Steve Thomas
1771 Edie Booth
1772 Louis Stanely
1773 Jack Zernial
1774 Sara B Reid
1775 Sam Rankin Barnes, M D
1776 Garry Brunson
1777 Mike Williams
1778 William A Barber
1779 Nathalie Paravicini
1780 John H. Scribner, Jr.
1781 Mary C Decker
1782 Kay F. Humphreys
1783 Hope Neely Gillespie
1784 John Haensly
1785 Kim Do
1786 Ray H Potter
1787 Eileen Potter
1788 Rory H Potter
1789 Joseph Salvador
1790 Cliff Elton
1791 Mary Ruth Craven
1792 Carolyn R Hesson
1793 Walter E. Hesson
1794 Tim Eng
1795 Susan Chisholm
1796 Carol Kemp
1797 Christine Ullrich
1798 Melvin Chappell
1799 Elise Vaughn
1800 M. V Stockbridge
1801 Peter Kirby
1802 Adena Cook
1803 Spohn Bill
1804 Raymond Wilson
1805 Carrol G Gury
1806 William D Nash
1807 John Edwards
1808 Fish and Wildlife Sv
1809 Charles Becker
1810 Jackie Boyd
1811 Vernon Clower
1812 Russell Coonley
1813 David Davis
1814 A N Eason
1815 John Edwards
1816 G J. Enis
1817 B L. Grissom
1818 Shein Roberts
1819 Royce Hodges
1820 Arvel Hubbard
1821 Bennie and Jerry King
1822 Lonnie Markham
1823 Wallace Mitchell
1824 Damon Pennington
1825 Dan Rhine
1826 Mrs J D Rorne
1827 David Seals
1828 Rebecca Small
1829 Charles Taylor
1830 Jerry Thompson
1831 W.D Western
1832 James Wheelers
1833 Darrel Wilson
1835 Mr B.L Grissom
1836 Bill Rowland
1837 Edie Booth
1838 Jane N Saginaw
1839 Paul M. Hathorn

620	?, D. O.
109	?, I Geo
808	?, Susan
938	Abbassi, Bechir
179	Abbott, Debra
1187	Abbott, Steven C.
992	Adams, C N
810	Adams, David O.
1437	Adams, Joe
185	Adams, Marjorie & Louis
990	Adickes, Leon
1068	Ahle, Bjorn
1430	Alexandar, John K.
435	Alexander, Caroline
1115	Alexander, Caroline
10	Alexander, Connie B.
1339	Alk, Christopher
1358	Allan, Urban S
365	Allen, Alan
1260	Allen, Carole H.
367	Allen, Debbie
875	Allen, Dolores A
1657	Allen, Jeff
997	Allen, Rue Lynn
1325	Allen, Willie
1411	Amberson, Marc E.
823	Ambrosy, Paula
407	Ammons, Maureen F.
1376	Anderson, James R.
489	Anderson, Leticia L
571	Anderson, Scott K
492	Anderson, Virginia
1756	Andrews, George
390	Anello, Abhay
952	Anthony, Luean
443	Anzalone, Louise
519	Anzaloro, Mario
1175	Archer, Nellie M.
1709	Arellano, Gonlalo
1086	Armand, Albert M.
1155	Armand, Annie M
1156	Armand, Carley Ann
314	Armstrong, Debra
646	Armstrong, Marianne
46	Armstrong, Sam W
502	Arnold, Forrest
1387	Arnold, Hiram P
1200	Arnold, Lynda L
366	Aronow, Judith
387	Aronow, Saul
175	Arsenault, Jevi
448	Ashton, John C
198	Assadourian, Mark A
439	Atchley, Morgana
379	Atmar, Margaret
1090	Attaway, Judy
1745	Atwood, Kent
1402	Avdl, George & Linda Pogue
200	Avery, George
604	Bach, Chuck

239	Bader, Beth
235	Bader, Scott
547	Baggett, Lou
583	Bailey, Bonnie
922	Bailey, Ernest
1074	Bailey, Patricia L
441	Bailey, Yvonne
1518	Baily, Mary
671	Baird, John
1603	Baker, Deborah B
37	Baker, Esther M.
1428	Baker, Esther M.
1252	Baker, Karen L
752	Baker, Ona G
776	Baldauf, Lawrence M.
130	Balingit, Maria R
693	Banul, Nancy
536	Barber, Bubbie
1489	Barber, Ethlrie
1778	Barber, William A
1282	Barclay, Robert R.
1035	Barker, Larry
738	Barnard, Peter A
1523	Barnes, Frances
325	Barnes, James R.
1718	Barnes, Kerry
1775	Barnes, M D , Sam Rankin
1698	Barnett, J R
534	Barr, Doris B.
1106	Bartholomie, Charlene
1475	Bash, Dee
1016	Bassett, Jacqueline
1574	Bates, Jack E.
1136	Bates, Jim
21	Bauer, Clarissa Kay
1297	Bauer, Dorris M.
328	Bauer, Mary A.
196	Bavousett, Rex L
928	Bavousett, Rex L.
474	Baxter, Barbara
1768	Baylis, Robert V
64	Beal, W. P.
958	Beard, Kenneth P.
1472	Beasley, R. Scott
154	Bebermeyer, Richard D.
1809	Becker, Charles
62	Becker, Marlys J
320	Bedgood, Jill
930	Bednar, Julia M
723	Begley, Michael
1122	Behrmann, Mike
327	Behrstock, Robert A
1525	Beirne, Martin D.
1519	Belcher, Susan
1682	Bell, Julie
1384	Bell, Karen
38	Bell, Kay
1589	Bell, Randall M
468	Bell, S Scott
363	Bender, Rebecca C.
1432	Benham, Donald L
569	Bennett, Dan
689	Berchey, J M
204	Berkshire, David C.

472	Bernett, Barbara
1347	Bernett, Barbara
1214	Bernstein, Melody
225	Berryhill, Chester F.
770	Berryhill, Chester F.
236	Berryhill, Henry & Louise
786	Berthelsen, Linda
1220	Berwick, Joe Anne
1194	Betzko, Barbara L.
919	Biles, Jr , Louis A
1803	Bill, Spohn
384	Billetdeaux, Susan H
985	Billings, Leslie Ann
1256	Billings, Ronald F
1338	Bin, Bobby
143	Binder, Ruth
289	Binnings, Christopher S.
1217	Bishop, Matt
692	Bixler, Mike
780	Bjerring, Isabella
700	Blackshear, Ronald
1659	Blake, Frank
1550	Blakesley, Ralph G.
658	Blakesley, Ralph G
668	Blakley, Calvin R
674	Blakley, Connie F
715	Bland, L G
1678	Bledsoe, Jr , Carl T
466	Block, Paul A
241	Bloomer, Betty L
1690	Boles, Brian P.
1757	Boles, Cecilia McSwain
1760	Boles, Ken
1658	Bonney, Lorraine G
593	Boone, Helen J
1771	Booth, Edie
1837	Booth, Edie
610	Booth, Edie A
1575	Booth, Elizabeth Anne
230	Booth, M D , Elizabeth Anne
599	Booth, R L
1618	Borders, Gene
54	Borg, Maria R
1120	Borneman, Matt
1276	Borsheim, Dawn
245	Bothe, Jean
1620	Bouillion, W D
1202	Bourick, T W.
907	Bowers, Jennifer A.
1625	Bowling, Beth
549	Bowman, Bonita
1272	Bowman, Peter
884	Bowmer, Cheryl
1810	Boyd, Jackie
1152	Boyle, Holly T
1711	Bozques, Joe
1561	Braden, James M
1269	Braden, Wilson
1522	Bradley, Jo An
85	Branam, Lawrence
86	Branam, Martha
144	Brandon, Luke
983	Brandon, Luke
177	Brandt, Julia

434	Brazier, Clayton
183	Breaux, Paul
1161	Brede, Ann
1183	Breedlove, M A
703	Breedlove, Roger
315	Brian, Karen L.
1245	Brians, Wallace S
1304	Briggs, Gale
734	Briggs, Josephine
1139	Brinkmeyer, Diane
691	Brister, Avis M
1184	Brite, Arthur B
1580	Brooks, John
1577	Brooks, Nancy
558	Brothers, Pat
588	Brotzen, F R
1331	Brown III, David P
1386	Brown, Abigail
1370	Brown, D R
458	Brown, Ellen
1071	Brown, Karen
1434	Brown, Tom & Marilyn
298	Browning, Mark
1462	Browning, Richard M
718	Brueggen, Teresa
31	Brummett, Joan
775	Bruner, Rosemary
1631	Brunham, Earl H
1776	Brunson, Garry
340	Brunson, Garry
1309	Bruseth, James E
929	Bryarly, Jr , Richard
287	Buckley, Sizanne
895	Buckman, John W.
1099	Budziszewski, Jil
1476	Buelangham, Gina
199	Buels, Jesse H.
317	Bunge, Mary C
1073	Burgess, Dirk T
769	Burke, Patrick T
18	Burkett, Winnie
146	Burnett, Debbie
430	Burr, Sheriton
647	Burroughs, Rebecca
528	Burrows, Donna J
1189	Burton, William J
1405	Buscher, Deborah E
227	Bush, Jr , E. H.
606	Butler, Annice
1173	Butler, D J
445	Butler, Jim
787	Butler, Katie Best
1188	Butwid, John
1722	Buzbee, Dora M
479	Byerly, Meg
203	Byrne, Helen E
819	Cable, Desiree Yavone
1209	Caldwell, V L
1392	Callery, Charles
312	Callicott, Tammie
509	Calloway, Micheal E
469	Campbell, Barbara N
364	Campbell, Carroll L
643	Campbell, Lorrie

1204	Campion, F.E.
267	Cannedy, Carl W.
1637	Carleton, Carla & Scott
1638	Carleton, Scott
422	Carpentier, Cat
1017	Carrell, Jonathan
663	Carroll, Ronnie
1672	Carter, Mark A
1168	Casey, Betty R.
1150	Cash, Georga
252	Casserly, Dennis
223	Castro, Diego A
234	Castro, Kathy
1238	Catala, Pierre
1079	Cato, Judy
566	Catt, Janice E.
99	Catter, Sam
345	Caudill, Claire P
1265	Caudill, John W
1218	Cauthen, George E
910	Cauthen, Patricia
1488	Cauthorn, V. Clay
1097	Cavanaugh, Sandra L
395	Celestine, Kathryn
293	Celusniak, Lou
1001	Cely, Gail S.
1034	Chaffin, Claudia
101	Chamberlin, Maria
824	Chaney, K.
1681	Chaney, Phillip
1465	Chapman, James D.
402	Chapman, P.
1798	Chappell, Melvin
24	Charles, Marion
706	Chavez, Guadalupe
518	Cheatham, Larry
1493	Chen, Weimin
57	Chirafis, John
1795	Chisholm, Susan
1423	Choate, Rodney
762	Chodrow, Joseph D
1744	Chote, Jr , Robert
1712	Chou, David
594	Christmas, Susan
353	Chudy, Carl
78	Chung, Leland W K.
256	Cintron, Rose Marie
221	Clark, Bernice
1461	Clark, Bernice
1211	Clark, Carol
307	Clark, Jeremy
737	Clary, Billie
788	Claussen, R. L.
1096	Clay, Jennifer
437	Clay, M
695	Clay, Mary Kathryn M
158	Clemenson, Curtis
294	Clemenson, Curtis
1359	Cleveland, Kay B.
649	Cleveland, Paulette L
936	Cleveland, Paulette L.
129	Click, Ruth
1022	Clifford, William S
1195	Close, Christopher

240	Clouse, Mervin R.
1811	Clower, Vernon
1646	Cluck, Rebecca and Rusty
360	Clunn, Richey H
1342	Coburn, M
868	Coffey, James W
378	Cohen, Mimi G
742	Coker, Mike
42	Cole, Curtis F
1047	Cole, Stephen
423	Coleman, Teresa Hall
1237	Collins, Carol M
316	Collins, Elizabeth
867	Colwell, Elaine
1499	Conarroe, Keith
601	Conaway, Melanie
640	Congelio, Rie
277	Conley, Carlton
531	Conley, Ray
1366	Conner, Richard C.
1114	Connor, Sean
1009	Conwey, Tommey S
1802	Cook, Adena
1380	Cook, John
1528	Cook, Randy
117	Cook, Rick
1812	Coonley, Russell
1557	Cooper, Amy B.
631	Cooper, Marybelle
802	Coram, Joseph G.
1502	Corman, Shelley
1408	Cornehl, Kathy
982	Cornelius, Bessie G
123	Corson, D. A
30	Cosgrove, Julia M.
1466	Courtney, Jim and Betsy
523	Courtney, Virginia L
105	Covici, Joan C
1388	Coward, Jessie
1135	Coward, Tori
470	Cowles, Laurence
791	Cox, Annalynn C.
1352	Cox, Patrick D
181	Cozzens, Kate
904	Crabb, David
368	Crabbe, Carol
912	Crabtree, Susan
285	Craddock, Jr , Dan M
8	Crane, Marilyn
842	Craven, Mary Ruth
1791	Craven, Mary Ruth
1583	Cravens, Al
1452	Crawford, George & Jeannett
941	Creasy, Judith D
1686	Cronan, Kathi
189	Croom, Carolyn
1355	Croom, Carolyn
632	Cross, Elizabeth
778	Crouch, Bryan L.
677	Crouch, Elizabeth Hansen
228	Crow, A L. & Corinne
338	Crow, Dr. Emil & Joan
704	Crow, Rodney K
487	Cruz, Rommel

1283	Culmer, Rose Marie
720	Culver, Dan S
1274	Cummings, Jennifer J
1111	Cunningham, Garnet L
948	Curby, Catherine
1369	Curless, Jerry
1614	Currie, Bob
939	Dale, Bob
751	Danie, Louise
2	Davis III, Daniel T
1717	Davis, Becky
1719	Davis, Bill J
1443	Davis, Daniel A.
1227	Davis, Danny
1813	Davis, David
560	Davis, Heidi M.
347	Davis, Nancy Kay
119	Davis, T
1438	Davis, W Norman
1216	Dawoudi, Osama
684	Day, Don W
1250	Day, Don W
732	Day, James E
641	Day, Jr , Leland S.
1321	DeBlanc, Julie
879	DeRidder, Janet
880	DeRidder, Mitch
1323	DeWalch, Binz
1014	Dean, James R
1578	Dearing, Gary
1253	Dearmont, Donald D.
783	Dearmont, Marjorie
1781	Decker, Mary C.
575	Dell, Barbara A
771	Demaree, Robert
382	Dempster, Ryland E.
1232	Denner, Larry
665	Denson, Mike
357	Deshayes, Jos Robert
654	Despres, Barbara
1652	Devenport, R Michael
243	Devine, Jeremy M
1043	Devito, Joe
187	DiGiovanni, Donna M
826	Diaz, M Cristina
1653	Dickerson, Don
1479	Diener, Donna
1545	Diez, Aurelio
687	Dill, Julia T
134	Dillard, Frankie D
292	Dingus, Ann B
373	Dinkler, Daniel R
80	Diver, Ronald J
1724	Dixon, Jan
1442	Dixon, Thomas L
1785	Do, Kim
1178	Dobbs, Herman
882	Dodge, Jane E
350	Dodson, A J
1319	Doege, Waneta
1391	Dolan, Rodney
77	Donaldson, Cecelia M.
1258	Donavan, Richard M
855	Donnelly III, Clarence W

251	Donovan, Anne
1708	Doolittle, David F
1520	Dowling, Mara K
1529	Doyle, Alder
388	Doyle, Gerry
1363	Drake, Alice
1705	Driscell, Naomi
614	Duff, David G
1714	Duncan, Lance
1548	Duncan, Mary B
724	Dunigan, Cynthia Jacob
731	Dunigan, Mike S
322	Dunn, Jon
1754	Dunn, Jr , Carl A
964	Dunn, Pat
1416	Durieux, Lori A
881	Duryea, Barbara
1409	Dutch, Margaret
858	Dutch, Richard C
304	ELms, Lana
440	Eager, Judy S
1814	Eason, A. N
82	Easton, Paula
1410	Edmondson, Gary R
680	Edwards, Carol
1254	Edwards, G
1665	Edwards, Gerard C
1807	Edwards, John
1815	Edwards, John
719	Edwards, Lana
471	Egan, Margarete
1277	Egan, Margarete
473	Elder, Tommy
1713	Elford, Timothy M
1447	Elioseff, Jane W.
135	Elkins, Helen E
651	Ellard, Jack
909	Eller, Shirley
1504	Ellis, Donna & William
22	Ellisor, Dave
850	Elsik, I Sandra
1790	Elton, Cliff
195	Elwonger, Mark
962	Elwood, Chris
246	Embry, Jessie M
686	Emmott, A V
321	Endlich, Michelle
1794	Eng, Tim
1816	Enis, G J
98	Erickson, Evelyn
1668	Erickson, John
310	Eskue, Audrey
180	Estes, Maxine
1663	Etheridge, Lee H
872	Evanoski, Walter M
1449	Evans, Alana
1324	Evans, Elaine
1081	Evans, Everett
1056	Evans, Peggy
1302	Evans, Richard N
1444	Evans, Stephen
999	Everett, Christopher S
279	Eyberg, Quentin C
1340	Ezernack, Wendy Leigh

1731	Falls, Owen and Pat
1704	Farley, Carla
1404	Farmer, Carol
596	Farmer, Tara
381	Fatherree, Rosetta
589	Faucett, William E.
1740	Feltman, Billy F.
17	Felton, Lorna G.
564	Ferbert, Elizabeth
1602	Ferguson, Bill
597	Ferguson, Jennifer
290	Ferguson, Merriwood
1538	Fharance, Stanley H.
1427	Fine, Catherine
394	Fine, Thomas R
837	Finley, Marc
1329	Finn, Margaret E.
685	Firestone, Marina
1166	Fisdich, Deborah
1808	Fish and Wildlife Sv
888	Fisher, Earl
1337	Fisher, Sally
1572	Fisher, Sue
832	Fisseler, Glenn D.
987	Flatt, Nancy C
988	Flatt, Robert N.
1005	Fleckenstein, Loren
299	Flick, Mary
1091	Flick, Mary
282	Florentin, Lea
1300	Flores, Rita M
259	Flowers, Betty E.
753	Flowers, Thomas M
1137	Floyd, Mary Margaret
696	Fodrey, Diane L.
1699	Foote, Stephen A
623	Footit, Margaret
624	Footit, Michael E
1624	Ford, David
1010	Ford, Martha
1064	Foreman, Charles R.
412	Forster, Robert W
576	Forster, Rosalyn S
1426	Fory, Russell
1440	Fosdick, David A
1422	Fourest, Charles E.
303	Fowler, Dan
1008	Fowler, Richard
561	Fox, David F
168	Frambes, Jean Joy
630	Francis, Robert
543	Frank, Pauline
1592	Franke, Mark
1591	Franke, Wendy
396	Franklin, Ann
906	Frantom, Marcy M.
1088	Franton, Gloria B.
1087	Franton, John I
816	Freeman, Kathy
851	Freisenbruch, Chris
510	Friddle, Laurie
1604	Fritz, Edward C
1015	Fry, Mary Lou
296	Fukuchi, Jeanne

986	Fuqua, Jr., John M.
652	Galett, Ray
574	Gallanto, R. P.
25	Gallaway, Jr., Robert L.
735	Gambill, Joan G.
1531	Garcia, Juan Carlos
1293	Garcia, Lupe
1006	Garde, James K.
935	Gardner, Bettye
559	Gardner, S. M.
1595	Gartner, Jack
1746	Gartner, Robert
1345	Garuclem, R.V.
1753	Gauger, D J.
1622	Gaylord, Heinz A.
1565	Gazas, William M.
1130	Gelley, Joseph
1546	Gemp, Alison W.
590	Gerson, James M.
1051	Gerus, Loretta J.
1424	Getach, John G.
1261	Geyer, Jacqueline S.
844	Gholson, Debra
457	Gibson, Shirley A.
110	Giesbrecht, Martin
785	Gilbert, Margaret A.
956	Gilbreath-Fienga, Ginny
1783	Gillespie, Hope Neely
399	Gillespie, Tim
93	Gillette, M. E
467	Gladman, J. Craig
260	Glasgow, Bonnie
581	Glover, Mary
682	Glover, Patricia
709	Goehrs, Glenda
1501	Goetz, Margaret A
767	Gokey, Nita J.
613	Goldfarb, Richard
848	Golding, Bert
426	Goldman, Carolyn
793	Goldman, Carolyn
1165	Golitko, Raymond L.
1224	Goller, Linda
14	Goloby, Jr., George W
419	Gonzales, Alma
733	Gonzalez, Joaquin B.
1500	Goodsen, Susan D.
1590	Goodson, Lilburn A.
140	Gorman, John E.
838	Goss, David
224	Goudeau, Sr., Anthony Lang
744	Grady, Cynthia
1333	Graham, Mabel H.
186	Grant, Richard B.
798	Graves, John M
809	Graves, Sean D.
637	Gray, Donald M.
1559	Gray, R M.
831	Green, Cynthia
901	Greenbaum, Irving
923	Greene, Shelley L.
539	Gregas, Norman P.
777	Gregor, Paul J.
92	Gregory, Clara F.

921	Gregory, Karen
789	Griffin, B. J
490	Griffin, Don
1123	Griffin, Nina
309	Griffin, Virginia
1351	Grimes, Patricia
1817	Grissom, B L
1835	Grissom, Mr B L
1243	Griswold, Maria
171	Groom, Stan
1450	Groover, Tom
1021	Grover, Brenda
702	Gruetzmacher, Kathryn
871	Grunenwald, Julianne S.
217	Gubbin, Barbara
308	Guerrero, Felix D.
1748	Guff, Douglas
1133	Gulick, Ray B
1621	Gumberger, George
1684	Gunn, Beth
283	Gury, Carrol A
1805	Gury, Carrol G
1179	Gutierrez, Irma
1418	Haase-Greenley, Carol
66	Hackney, Noragene
813	Hadipour, Pat
477	Hadley, Jennifer
1784	Haensly, John
1707	Hagstette, Guy
153	Hair, D W.
1515	Hajny, Teresa T
95	Hall III, John W.
1145	Hall, Dolores
595	Hall, Larry Michael
1688	Hall, Randal M
69	Hallmon, Billy W
1720	Halstead, Kayee
1314	Hambric, Linda Shaw
1669	Hamil, Jean
1065	Hamje, Matt
258	Hammond, Hall S
1360	Handler, Sarah
815	Hanel, Sr. Mary Magdalen
586	Hankins, Frank D
1013	Hankins, Linda
450	Hannah, Flo
1556	Hansen, Crista
414	Hansen, Keith C
1153	Hansen, Larry
790	Hansen, Margaret W M.
178	Hardesty, William & Carolyn
424	Harding, Babette B
495	Harding, G Stephen
1734	Hardy, Chris
176	Harp, Steven
1579	Harper, Helen Potter
905	Harrell, Stacey
265	Harrington, Charles W
475	Harris Jr MD, Hunter P
1429	Harris, Janie A
1649	Harris, Michael
1284	Hart, C E
1676	Hartt, Lynn
323	Hartzog, Linda

1455	Haskell, Georgia L
1661	Hassell, Carla
27	Hatchett, James W
1839	Hathorn, Paul M
1271	Haugen, Larry G
1675	Havard, Curt
169	Havard, Michael A
257	Hawbaker, Joan
705	Hawkins, Kenneth
97	Hawthorne, Mrs Jessie Mae
150	Hawthorne, R N
51	Hawthorne, Rick
1327	Hay, M
1151	Hazard, JoAnn
1240	Hazle, Rupert
961	Head, John
1482	Head, Peggy
1191	Heavey, Jamie
41	Hefner, Brian W
36	Hefner, Laura
849	Heino, Ruth
579	Heldenbrand, Sharon
75	Helm, Brent & Jan
1406	Heltkamp, Blair
996	Henao, Wanda
1693	Henderson, N E
1025	Henry, Jamie
1485	Henwood, Suzanne C
1454	Herbert, Jr , Arthur J
1048	Hering, Anthony
20	Herman, Richard
1203	Hernandez, Rose
1262	Herrick, Tom L
1264	Herzog, Carl H
1792	Hesson, Carolyn R
1793	Hesson, Walter E
1104	Hester, Joy
608	Hicks, Ann E
1615	Higginbotham, Aaron
1052	Higginbotham, LaNona
626	Hill, Robert W
973	Hill, Vivian
1393	Hillis, R Stephen
741	Hillman, Richard
451	Hinds, Dan H
913	Hines, J. David
214	Hines, John D.
1750	Hines, Louise
845	Hirsch, Karen J
43	Hoagland, Dale F
836	Hoang, An
456	Hobbs, Kay
517	Hobbs, Kristin
1819	Hodges, Royce
276	Hoffman, Arlene
229	Hogan, Thomas & Grace
112	Hogge, Mark L
113	Hogge, Veronica A
447	Hoiden, Virginia
821	Holderfield, Jeffery K
1316	Holland, Rupert
1066	Holland, Shirley L
1053	Holley, Den
1171	Holliday, Paula Nash

889	Hollingshedd, John
1397	Hollis, James M
132	Hollis, Jeffrey B
389	Holst, Margo
107	Holt, Lillian Jean
88	Holt, Marion
1160	Holzmer, David
1401	Honel, Michael
284	Hood, Byron
1762	Hooper, Cole
1394	Hooper, Jr , John C.
1613	Hooper, Ray
346	Hoover, Sandra B
244	Horn, Alice E
1186	Horn, Rodney J.
1445	Horne, Jr., Henry
713	Horst, Lance
886	Hoskins II, James C.
1737	Hough, Troy R.
452	Houghton, Robert W.
675	House, Linda
1247	House, Sam
250	Houston, Diana E
1102	Houston, Ireene
925	Howe, Bonnie
994	Howell, Marty
1650	Howell, Matt
1242	Howell, Seth C.
438	Howells, Ashleigh
1050	Hoyt, Edith M
633	Hoyt, Jeffrey C.
403	Hu, Daniel
1820	Hubbard, Arvel
120	Hubbard, Claudia
915	Huddle, Danielle P
1654	Huete, Kenneth N.
1612	Hufford, Ron
1229	Hughes, Pamela S.
834	Hughs, Milton R.
1041	Hulce, Durward P
49	Hulett, Marilyn E
1782	Humphreys, Kay F
949	Humphries, Ola B
191	Hurd Jr., Fred A.
431	Hurd Jr , Fred A.
707	Hurley, PhD., Linda K
1396	Hurt, Shirley F
1028	Hutchins, Helen
1694	Hutchinson, Z.C.
491	Hutchison, Larry L
520	Hutton, Jeff
459	Huynh, Thuy
1495	Inahara, Barbara
1143	Innmon, Marietta
607	Iovannone, Rose
454	Irwin, Lauren
1328	Isaacs, Jane
902	Ivy, James T
65	Jackson, Christine
1527	Jackson, Clay
255	Jackson, Gayle Y
1728	Jackson, James R
1208	Jackson, Marcia
1193	Jackson, Mark J.

1664	Jackson, Sheila
272	Jacobs, R. C.
498	Jacobsen, Jeanne
1395	Jaen, Didier T.
622	Jameson, Ruth A.
67	Janks, John S.
481	Janowiak, Blythe
1093	Japper, Bruce
712	Jarmon, Joyce Hope
1023	Jarnell, Zak A.
1660	Jeffereys, Jenny
1177	Jenkins, Judith
1585	Jennings, Jack
966	Jessup, Steve
1606	Jeter-Edwards, Julie
1149	Jetie, Paul
332	Jewert, Russell
968	Johnson, Diana R
1075	Johnson, Dorothy H
1421	Johnson, James E & Bausg
931	Johnson, Kevin
1285	Johnson, Lynne B
779	Johnson, Paul C.
504	Johnson, Sr., Donald M.
506	Johnson, Walter
386	Johnston, Maxine
401	Johnston, Robert
1299	Jones, Annette B
61	Jones, F Nowell
554	Jones, Hampton
19	Jones, Margaret H
1700	Jordan, Beverly W.
967	Joseph, Carolyn
212	June, Sylvia
273	Kabisch, Dorothy
411	Kaderabek, Marie
226	Kallerman, Richard
1477	Karnes, Beverly
729	Kassanoff, Jim
268	Kastner, Hank
1564	Kastner, Hank
978	Kaye, Patricia G.
887	Keely, Ed
1645	Keely, Ed
891	Keenan, Bruce
324	Kehoe, Mark R
1490	Keister, Carol M
1521	Keller, Conie
1169	Keller, Kristen
1198	Kellock, Isolde E.
300	Kelly, Sam
1796	Kemp, Carol
114	Kemper, Tom
894	Kennedy, Peter D
1212	Kennedy, Ross P
160	Kennon, Chris
573	Kepner, Janet
1196	Kiddy, Nick
1291	King, Anthony P
1469	King, Barbara
1644	King, Bennie E
1821	King, Bennie and Jerry
358	King, Enid C.
1383	King, Kyle W

840	King, Sally
1146	King, Tracy S.
40	Kingdon, Keith
1599	Kinney, Marilyn
692	Kippen, Kermit
937	Kirby, Betty B.
1801	Kirby, Peter
71	Kircher, Peter O.
237	Kirchoff, Deborah
714	Kitchen, Katherine
102	Kleiman, Ann
326	Klemola, Jeannette
1125	Kliethermes, Deborah
1696	Klint, Pirjo
975	Klippel, Paul D.
334	Klumb, Elizabeth A.
784	Klune Jr., Frank R.
1287	Knappenberger, Else
781	Knight, James L.
897	Knight, Tami
661	Knopp, Gregory M.
1267	Knox, Rachel
650	Kopycinski, Jay
678	Kottwitz, Ed
1446	Koutroulis, Margie O.
981	Kovar, John
242	Kowack, Janine
1266	Krakowski, Jim
1210	Kramer, David
1417	Kramer, Ken
1420	Kramer, Tim
862	Kriedeman, Eddie Jean
125	Krlieger, Dennis
421	Kulstad, Erik
376	Kulstad, Mark
1415	Kuper, Holly
843	Kyle, J. R.
1640	La Pierre, Myra
710	LaFountain, Cathy J.
301	LaJoe, Joseph C.
876	LaRose, Michelle
893	Labuga, Earl A.
494	Ladd, Judy
825	Lagrimanta, Amy
60	Laird, Debbie
496	Lam, Christine
400	Lambert, Patricia
1474	Lambertz, L.T.
433	Lambertz, Lisa
896	Lamos, Colleen R.
634	Landau, Nancy
370	Lang, Linda
269	Langston, Aileen
56	Lanier, Martha S.
1365	Lapierre, Martha
208	Larson, Robert M.
911	Larter, I.L.
122	Larter, Irene
108	Lasof, Marilyn
1257	Latchaw, Jr., Ralph B.
645	Le, Uyen
1113	Leal, Rita
333	Learned, Halcyon R.
416	Leber, Sharon K.

58	Lee, Carol E
136	Lee, Carol E
1747	Lemke, R L.
118	Lemon, James M
697	Leonardon, Carol M
548	Leslie, Dorothy M
1127	Lester, L James
32	Lever, Robert H.
933	Levi, D.
425	Levoy, David
1544	Levy, Annabel
1228	Lewis, Barbara E
1467	Lide, Al
1040	Lieb, James M
1532	Lin, Jean Wang
1560	Lindberg, Paul
133	Lindsay, Robyn L
1249	Lindsey, Carl
662	Lindsey, Penny E
1239	Linker, John W
1039	Lirette, Mary C
898	Lising, Bette
1069	Lloyd, Joshua E
598	Loden, Benjamin L
514	Logan, Michael S
145	Loggins, Nancy K
869	Lomax, Rita J.
1541	Long, Elisa J.
262	Long-Desmit, Karen
385	Lopez, Alicia
940	Lord, Mychele
1307	Lou, Gary
23	Loudermilk, Sarah Duck
1112	Louie, Kathryn
918	Louis, Linus
1182	Lowry, Jennifer
1100	Lucas, M. Stephen
555	Lukehart, Don E
444	Luksza, Christine
1769	Lundquist, Eric J
794	Lunstroth, T
972	Luster, Jo
1537	Lyles, Sonny B
701	Lyon, Patricia
1244	Lyons, James J
873	Lyons, Patricia Ann
577	Maas, Elaine H
297	MacAulay, William B
1749	Macalusa, A A
163	Mace, Jane E.
699	Mace, Jane E
1176	Madderra, Karen A
1190	Maddux, Nicole
1310	Maddux, Tom
1553	Madrulli, Robert P
374	Magalhaes, Christine
617	Maher, Tim
39	Mahley, Robert B
1735	Maldonado, John L
157	Malinowski, Audrey
852	Malmquist II, Kurt
1174	Maloney, Gerald G
605	Manis, William
1723	Mannchen, Brandt

1368	Marcano, Korina
1372	Marcano, Sonia
1486	Marguart, Ann
138	Marion, Stuart
63	Markeloff, R G.
1822	Markham, Lonnie
853	Marquart, Ann
828	Marquart, Wilhelmina
1765	Marrack, M D., David
932	Marsh, David
355	Marshall, Carol L
1494	Marterstock, Steve
883	Martin, Elizabeth
1629	Martin, Harris
1673	Martin, II, Joseph B
351	Martin, Joyce G
587	Martin, Kenneth & Louise
864	Martin, Mrs Robert E.
603	Martin, Robert
1584	Martin, Shaun
1030	Martinez, Sonia M.
1132	Massey, Barbara H.
1083	Massey, Richard P.
839	Mathis, Judith Cox
202	Matlock, Teresa A.
161	Matteson, Celie
359	Matthews, Elgin
1020	Matthiesin, David
1312	Mattiza, D S.
104	Matusiak, Constance
1570	Matztin, Dave
1101	Maute, Jane
635	May, Melissa
1407	Mayer, M Clifford
392	Mayer, Mary E.
48	Mayon, Taylor
33	Mayou, Ellen
1626	Mayou, Ellen
1158	Mays, George R
1507	Mays, George R.
406	Mazze, Seth
1157	McAnally, William B
428	McArthur, Patrick
429	McArthur, Tanya Pene
984	McCabe, Charles
1164	McCallion, Elaine
1727	McCann, Pamela O
11	McCarty, Elizabeth
1057	McCasland, Lee
188	McCauley, Robert S
50	McClain, Ken
34	McClain, Sandra D.
672	McClintic, Jean
1344	McCollum, Courtney
1341	McCollum, Sharon
1185	McCorlel, Kenneth
156	McDaniel, Fred W.
318	McDonald, Yvonne
1389	McDuff, W R
436	McGill, Marilyn G
1172	McGinnis, Patti
515	McGuffin, Eddie N
513	McGuffin, Kathryn L
1322	McGwamery, Janet

336	McInturff, Dr A D
1117	McIver, Karen
1505	McKay, Emily
899	McKee, R Clayton
989	McKenney, S. David
957	McKinney, Aubrey R.
993	McKinney, Ramon
951	McLaughlin, Beverly
1569	McLeod, Eva S
1481	McManus, Charla O
1478	McManus, Paul
1516	McManus, Ron
182	McNair, Frances
139	McNairn, Bonnie
1596	McNamara, Jessica
974	McNeil, Heidi
1611	McNellie, Bruce
121	McNiel, Dolores
254	McQuarie, Elanor H.
1761	McSwain, J. C
1758	McSwain, John R.
1759	McSwain, S. G.
1655	McWhorter, Ike
619	Megarity, Mrs Barclay
721	Mehaffy, Mary Alice
7	Meistrich, Helen
1124	Melcher, Karsten
500	Mendel, Jennifer
746	Meredith, Connie
955	Merrill, Linda
1600	Metivier, John
1248	Meyer, James E
1070	Meyer, Joyce
814	Meyer, O.P., Jane
976	Micheletti, Audrey a
1439	Milauskas, Steven J.
192	Milbourn, Catherine
1736	Mildren, David
991	Miles, Bruce R.
759	Miles, Toni
1729	Miller, Charles L.
670	Miller, Darlene
1510	Miller, Larry G
1399	Miller, Lynn E.
1487	Miller, Michael
591	Miller, Sharon
690	Miller, Stephen
805	Mills, Bruce W.
148	Mills, Reginald
592	Mills, Reginald
397	Minyard, B.
1473	Miser, Pat
1343	Mitcham, Jeff
1571	Mitchell, Gatlin L
1378	Mitchell, W.A.
1823	Mitchell, Wallace
1213	Mizell, Michael E.
653	Mock, Tim
698	Moes, Pamalla K.
1049	Mohr, Isabella R
1742	Monds, Bill
580	Mondshine, Shirley
455	Montague, Carol
488	Montez, Edward A.

90	Montgomery, Mrs Roger
59	Moore, Jerome A
127	Moore, M D , William P.
1280	Moore, Wes
1685	Morales, Jess G
535	Morgan, Celia
362	Morgan, Jr., C. A
1092	Morgan, Lois W
349	Mornsey, Jerry L
1141	Morris, Alethiea
749	Morris, Judy A
482	Morton, Earlene
219	Moss, Rebecca
413	Motheral, James
453	Mount, Charles M.
194	Muckleroy, William E
667	Mueller, Debbie
341	Mueller, Dorothy
89	Mueller, Gretchen
830	Muenzler, Allan
1503	Muir, James A
611	Mullikin, George
1162	Mullins, Chalon
1667	Mulrooney, Mark
1435	Murphy, Joseph
1806	Nash, William D
995	Natevrn, Harvey
934	Navarro, Juan
1033	Neal, Barbara J
173	Neal, Bob
854	Nederman, Elizabeth
483	Ness, Anne
545	Newman, Joan
1509	Newman, Mary R.
147	Newton, Celeste
480	Nguyen, Hanh
1588	Nicholas, Rosemary
1633	Nichols, Todd
1576	Nickelson, Nick
761	Nimmons, Cynthia
1206	Nitschke, Elaine M
861	Noble, M D , Marvin
570	Nordgren, John M.
551	Nordhem, A. D.
1539	Nordstorm, Cristy & David
797	Norman, Robbie
1457	Norris, Gordon B
131	Norris, Theron R
47	Null, James A.
415	Nunez, Angela
970	O'Brien, Madge
87	O'Nan, E. M T
621	Oakley, John W.
773	Oguzhan, Errol R
1119	Ohlson, Martha J
616	Ohman, James E
1508	Ohman, James E
220	Ohsie, William
552	Oldfield, B A
1199	Oliver, Lloyd W
1354	Oliver, Suzanne K
1483	Olivo, Nikki
164	Olsen, Claudia D
162	Olsen, John M

165	Olsen, Kate A
1038	Onstott, Jr , George C
801	Orellana, Richard
211	Organ, Hope
796	Orgin, Carol
1725	Orlando, Ann Hope
963	Ortiz, Carla
213	Ortiz, Larry A
405	Osburn, Barbara L.
1738	Oubre, Kenneth J
568	Oviedo, Luciano O
1029	Owens, Paul B
1292	Pace, Jackie A.
1131	Padue, Bettye
803	Page, Andrew J.
1318	Palmer, Aimec Lea
774	Panzarella, M D., Robert
683	Paolo, Thomas C D
417	Pape, Marianne
1779	Paravicini, Nathalie
1496	Pardue, Gary S
856	Parker, Margaret
508	Parker, Mark A
1082	Parks, Louis B
305	Parmesan, Elena
1726	Parry, R J.
302	Parry, Ronald J
1601	Partridge, Robert E.
1308	Pase III, H A (Joe)
270	Patterson, Joel T.
233	Patterson, Michael E.
331	Patton, Howard
739	Payne, Claud
375	Pease, Marion D.
409	Pearsall, Gillian
688	Pearson, Anne
1126	Peatross, Janet J
648	Peck, Henry
1451	Peck, Robert M.
916	Pedroza, Mary
807	Pelty, Larry
380	Pemberton, Nathan K
1552	Pendergast, Robert L
1320	Pennington, Damon
1824	Pennington, Damon
1129	Pentecost, Stacy S.
1109	Perroni, Cordelia A
1107	Perroni, Mikie
372	Perry, F
1710	Perry, Frances
1334	Perry, Johathan
9	Perry, R Bruce
655	Perry, Robert
1032	Perry, W.W
1201	Persio, Christine D.
959	Perttula, Timothy K
1089	Peters, Dale R
1108	Peters, Mike
1180	Peterson, Frances C.
1163	Peterson, Sandra
1751	Pette, Bob
1356	Pettingell, Noel
866	Pfaffenberger, Sandra J
106	Pfeil, Michael B

141	Phalen, Patricia
427	Phelps, Dean A.
857	Phillips, Bob
1491	Piclay, Nacina R.
541	Pierce, Jonathan A.
722	Piercy, Donna
462	Pierre, Douglas
1330	Pierrescott, Joanne
1061	Piller, Don
1154	Piper, Katherine W.
1281	Pirtle, Mike
1598	Plott, Robert M.
908	Plumb, Carole
1349	Pope, Sue
578	Popper, Darlene M
330	Porter, Carey
410	Porter, David
155	Post, Andy
1787	Potter, Eileen
1786	Potter, Ray H.
1788	Potter, Rory H.
1241	Powers, Michael J.
659	Pratt, Janice
15	Prehmus, Cynthia A
319	Prendergast, Kelly
1752	Preston, Gloria
1268	Preston, Marie
222	Price, Carol
446	Price, Margaret F.
184	Provost, Julie
205	Prusak, Deanne
1549	Pulido, Martha
1662	Pumphery II, Joe D.
291	Puppe, Elaine
892	Purinton, Donald
79	Purinton, Donald L.
408	Putham, Melody
582	Quoyeser, Isabella
664	Quoyeser, J. Chris
1103	Raiman, Sara
1263	Rains, David
1346	RainsIII, Robert C
166	Rainwater, Johnnie J.
1634	Rambin, Daymon
1441	Ramey, George H.
1004	Ramirez, Edward
1	Ramirez, Leslie
111	Randall, Thomas C.
795	Rangel, Rob A
754	Rapoport, Sandra B.
811	Ratcliff, Michael
1695	Rauer, A B
1067	Rawlins, Michael C.
1651	Ray, Leon E.
128	Rayburn, James
497	Reaux, Melissa
1497	Rebsrock, John W
1582	Red, Ellen Robbins
636	Redding, W. C
799	Redman, Michael
45	Reece, John R.
1511	Reed, Larry
1766	Rees, Tom
1774	Reid, Sara B

760	Reiser, Katharyn D
1433	Reitan, Leo A
885	Rembert, Mayan
1506	Resnick, M.W
53	Rexer, Judith E
207	Rey-Bear, Dan
544	Reynolds, Dorothy J.
1609	Rhames, Denise
1825	Rhine, Dan
420	Rhines, Ramona J
656	Rice, Richard M.
1278	Rich, Catherine A.
1140	Richard, Shaun J.
950	Richards, Maria C.
512	Richards, Mary
540	Richards, Michael J
521	Richardson, Lee A
493	Richey, Ann
1739	Rickard, George
1045	Ricketts, K. Suzanne
660	Ridder Jr , Donald R
1055	Riller, Kathleen
841	Riser, Will & Jan
1042	Riss, Mary Ann
253	Robb, G P.
1403	Robb, Gloria
96	Robberson, Gwen W.
68	Robbins, Nancy S
52	Roberts, Dusty
1221	Roberts, Dusty Cheryl
600	Roberts, James
1818	Roberts, Shein
1222	Robinson, Sally
1170	Robinson, Sherman
782	Rocky, Michele
1301	Roddey, Gardiner
1105	Rodrigez, Ramiro
638	Rofkahr, Vicky
1110	Roman, Eleanor
942	Roman, Johathan
1567	Romeo, Gary
1484	Romero, Robert N
1826	Rorne, Mrs. J.D
890	Rosales, Leticia
197	Roschke, John G.
1639	Rose, Lois M.
1148	Roseaberger, J.
532	Rosewagner, Anna
1375	Ross, Alex
1231	Ross, David S.
748	Ross, Geri
449	Rouse, Eugene F.
485	Rousseau, Richard M
1390	Rout, Sharon
1836	Rowland, Bill
666	Rowlett, Raymond
829	Royster, Abe
758	Rozell, Peggy
1142	Ruckstuhl, Eric
1011	Ruggerio, James
563	Rundel, Amy
1679	Rushing, Cliff
1764	Rushing, Cliff
476	Russell, B L

812	Russell, Dawn
1605	Russell, George
311	Russell, Sue
903	Rutowsky, D
1226	Ryan, Ted E
1286	Ryan, Ted E.
266	Sacker, Matthew
1838	Saginaw, Jane N
980	Sakuraba, Takuya
977	Salinas, Blanca N
4	Salmon, Hope
1789	Salvador, Joseph
1513	Salyer-Caldwell, Ann
1290	Sanchez, Celia
1311	Sandalio, Efrain
1671	Sansom, Andrew
271	Sardar, Marika
800	Satterlee, Wes
1471	Scardino, Barrie
740	Schenker, B K
625	Scherer, Stephen
1085	Schiebel, Richard
1670	Schinke, Susan
530	Schmidt, W G.
1674	Schmitt, Lee J.
170	Schobert, Don
562	Schoelman, Becky
565	Schoenewolf, Ronald L
1568	Schoettle, Wayne
947	School, Mark
1159	Schott, Sally
354	Schriever, William
1460	Schriever, William
542	Schultz, Cynthia Ann
1197	Schultz, Paul D.
1234	Schultze, M J.
1018	Schumacher, Mark
126	Schutt, Cheryl
1037	Scott, Jenna
998	Scott, Robert O
1780	Scribner, Jr., John H.
1827	Seals, David
525	Seaver, Lyle G
1063	Seay, Molly
602	Sebastian, Marvin J
343	Seldon, Niles
960	Sell, Dan
1512	Sell, Dan & Linda
1332	Seller, Kristina
342	Sellers, Wayne C
1517	Severide, Suzanne
329	Seynaeve, Barbara K
478	Shah, Amish
501	Shah, Bela
201	Shaw, Sarah L.
920	Sheffield, Jeremy
463	Shein, Wang
1632	Shelton, Larry D
1288	Shepreen, Beatrice
83	Sher, Raphael
1413	Sher, Raphael
464	Sherman DVM, Karen S
953	Sherriff, Georjean
1246	Shields, Lucy

1534	Shimek, James
1078	Shipman, Charles J
1118	Shivestrg, Rick
1627	Shockley, Frank B
1593	Sieber, John H
1608	Sieve, Bruce W
73	Sifford, J W
1566	Silha, Edward
1448	Silva, A. Lila
1273	Silvere, Iris Taffel
817	Simmons, Diane
377	Simmons, Joyce G
1702	Simons, Sedge
1648	Simons, Sedge L
1147	Sims, James H
28	Singleton, Laura A
432	Singleton, Laura A
1012	Sinkar, Raj
1095	Sirbasku, David
1026	Skarke, Mr R
846	Skiba, William E
3	Skinner, PhD, S Alan
507	Sleigle, L W
1353	Slouacek, Betty
1828	Small, Rebecca
924	Smary, Steve
1543	Smegal, John A
679	Smith, Betty M
717	Smith, Brian
1573	Smith, Charles F
1647	Smith, Dennis A
344	Smith, Frances G.
627	Smith, Gordon W
505	Smith, Greggory K.
1715	Smith, J Susan
945	Smith, Jamie P.
1298	Smith, Jayne R
556	Smith, Jr., James A
371	Smith, Marlene
1459	Smith, Marlene Tremblay
1361	Smith, Marvin W.
529	Smith, Peggy
1230	Smith, Robert F
1270	Smith, Roberta J
1058	Smith, Stephanie P
1703	Smith, Wanda L.
261	Smith, Wendell L
391	Smith, Wilbanks & Joanne
167	Smolinsky, Gerald
100	Snypes, William T.
1697	Soltzman, Frank
35	Sosa, Irea C.
216	Spalding, George
190	Speck Jr , Carlos D.
1610	Spence, John W.
969	Spiller, Kelly
1294	Spong, Peter
84	Sprinkle, G K
1181	Spurlock, Judy
1059	Spurlock, Monica
461	St John, Stephanie
524	Stacey, June C
730	Stafford, Anne
499	Stagen, Jackie

247	Stalk, John G.
1382	Stallings, Scott
1607	Stanbery, Becky
979	Stanek, Dennis J
1772	Stanely, Louis
878	Stanley, Richard G
91	Statham, Diane L
1431	Statham, Diane L
877	Stech, Bonnie
6	Steed, Dr. George H
5	Stegman, USFWS, Mary Jo
339	Steinbach, Joseph C
418	Stelling, Michael
1003	Stepchiski, Mike
398	Stephenson, C. K.
766	Stewart, Robert
1514	Stewart, Sandra C
29	Stigler, Dorothy O
1296	Stitzlein, Jean
1536	Stivison, Ralph
1800	Stockbridge, M V
1223	Stocktan, Karen
193	Stoker, Jim D
12	Stokley, A. K.
13	Stoley, Karen S.
1412	Stoll, Darline
1468	Stoltz, Jim
1019	Stone, N. Susan
103	Stone, S Lee
1680	Stout, Mark
1219	Stovall, John Michael
1587	Stowe, Donna M
533	Straiton, Melanie
756	Street, Beth
1464	Street, Beth
1498	Strickland, Stephanie
516	Strond, Verlo
792	Strong, Michael
946	Strong, Michael
275	Strong, Thueser
1597	Sullivan, Deborah L
1046	Sunday, Walt
546	Supulver, Mary Lee
1060	Svedeman, Lee
1398	Swanson, Eric William
1167	Swanson, John R
1371	Swartz, Stephen
142	Swedo, Jana
1414	Swiatkowski, Raymond
1763	Switzer, Ronald R.
657	Swords, Lee
1315	Sykes, C.D
465	Sykes, David
772	Tafoya, Matthew Jay
81	Talley, Pat
954	Talley, Pat
278	Talley, Zoe B.
1689	Tamlecsley, Kelly
1128	Tanner, Paul
1326	Tavangarian, Cathy
1829	Taylor, Charles
263	Taylor, David E.
572	Teats, Betty B
1381	Telge, Glen

1357	Tennyson, Linda
694	Terrell, Clark
1733	Terry, David K.
1062	Terry, Sherlyn
673	Teter, Don
818	Thawley, Frederick B.
1098	Thetford, Betty R.
1031	Thetford, Paul E.
55	Thomas, Allen & Jane
1121	Thomas, H.A.
248	Thomas, J. M.
1116	Thomas, Karen L.
1554	Thomas, Kevin
281	Thomas, Mary Ellen
914	Thomas, Mary Ellen
1770	Thomas, Steve
584	Thompson, C. Jane
1830	Thompson, Jerry
1138	Thompson, M. Terri
238	Thompson, Sallie Mullins
1027	Thurman, E.P.
859	Thurston, B A.
1706	Tiebout, James
747	Tigner, Mary W.
1251	Tillett, Alice C.
442	Timmons, Jeffery
1236	Tincher, Anne V.
1732	Tipton, Margaret
1656	Tobias, Johnny A
1453	Todd, David A
1463	Todd, David A.
1691	Tomasso, Kendall
249	Toner, David
70	Toole, Shawn
1555	Toon, Steve
965	Tow, Donnie A.
352	Townley, Waldo N.
567	Townley, Waldo W.
874	Towns, Scott
1205	Townsend, Kerry
1716	Tracey, W David
1683	Trahan, Jon
1002	Travis Jr., Arthur E.
943	Trehan, Nidhi
74	Truett, Joe C
289	Truitt, Kristen D.
537	Tullar, Douglas E.
827	Turetzsky, Greg
553	Turnbull, Lon
1072	Turnipesco, R. Daniel
1084	Turnipseed, Helen Roy
1275	Tuttle, Suzanne
585	Tveten, John L.
1797	Ullrich, Christine
288	Unterharnscheldt, Dr. A G
927	Urban, Cheri H.
1619	Ussery, Earl G.
231	Utgard, W D.
1743	Utley, Barbara
1533	Uzman, Akif
1741	Vackar, James
1641	Vackar, Mike
76	Valenza, Ph.D , Janet
743	Vallejo, Carol

1419	Van Buren, Eric J
1563	Van Kerrebrook, Phyllis
1225	Van Loon, Lornis M
1306	Van Oart, June
1687	Van Riper, Sherma
1233	Van Sickle, Marjory
486	VanBergen, Erin
1425	VandBunt, Lori S.
1558	Vandebunt, Rebecca J
72	Vandel, Diana
1767	Vann, Leon F.
1542	Vann, Zuley Pruiz
755	Vardiman, M. Camille
337	Varley, Victoria & Mark
1799	Vaughn, Elise
1305	Vawter, A.L.
206	Vecchio, Adrienne
612	Vecchio, Adrienne
356	Verner, Cheryl
1458	Verret, Robert
1635	Verret, Robert
639	Vicars, Jeremy
152	Villalongin, Karen
149	Vinson, Terry
768	Vollweiler, Barbara
1400	Von Peccoz, Wendy Beck
1701	Vondrasek, Elaine
404	Voss, Heinz E
484	Vu, Christie Thao
460	Vu, Dung
1134	Wade, Lowell E
1364	Wade, Pat
1255	Wakefield, Geoffery
870	Walker, Bonita
151	Walker, Clark
1623	Walker, Clark
1007	Walker, Diann
971	Walker, George D
750	Walker, Nyal
681	Walker, Pam
1628	Walker, Richard A.
863	Waller, D K
295	Walters, Eva Marie
538	Walters, F H.
280	Walters, Frances H
1530	Wang, Albert
527	Ward, Elizabeth
822	Ward, Skip
1313	Warhol, Mark
764	Waters, David L.
1480	Wathenl, Lisa
1677	Watson, Floyd A.
393	Watters, Steven A
526	Weaver, Carol
369	Weaver, Debra M
313	Webster, Joan V.
763	Weems, Pat
1215	Weinhouse, Amy
917	Weir, Kenneth G
1054	Weiss, Jr., Leon C.
1077	Weiss, Patricia P
1630	Wells, Joe
264	Welsh, David
1259	Wenk, Bonnie E.

642	West, Joel
1831	Western, W D
745	Westn, Richard
926	Weston, Elizabeth
1207	Wetherell, Ray B
1367	Wheaton, Stephen R
1832	Wheelers, James
833	White, Cheryl D
557	White, Dallas
383	White, Fred
1551	Whitesides, David A
1730	Whitmire, Libby
860	Whitney, Mrs. D L
820	Whitsett, Donna
1144	Whittington, Lettalou G
711	Whittle, John A.
116	Whitworth, Mary Ella
1666	Wickwire, Linda B
503	Wiener, Jr., Bill
944	Wikes, Walter
1235	Wilbanks, Tom
1295	Wildinson, Lamar
1373	Wiley, Robert P.
1492	Wilhamson, Anna
215	Wilkinson, Joe
629	Wilkinson, Peggy
335	Willey III, William W
1436	Willey III, William W
1581	Willey, Gary
1755	Williams, Clark
274	Williams, Claudia Z
900	Williams, Cornella
550	Williams, Emma Ray
1586	Williams, James A
728	Williams, Kevin
727	Williams, Kirby
726	Williams, Mary Sue
1777	Williams, Mike
124	Williams, Page S
1524	Williams, Richard
1535	Williams, Ronnie
725	Williams, Stacy
716	Willingham, F. F
361	Willis, Elizabeth G
26	Willman, Mrs R B
676	Willman, Mrs R B
1385	Wills, Fred H
1362	Wilmoth, Carole
210	Wilshire, Linda
618	Wilson, Bobby
1833	Wilson, Darrel
306	Wilson, Dorothy C
1594	Wilson, Dorothy C
628	Wilson, Jame S
522	Wilson, Jeffrey Scott
644	Wilson, Jon
1804	Wilson, Raymond
1336	Wilson, Ronnie
865	Wilson, Thomas
708	Wilson, Wynn A.
218	Wimsatt, William M
1642	Windham, Bob
1643	Windham, Gary
1379	Wingfield, Laura E

1317	Wingfield, Susan E
757	Wingfield, Wendy
1279	Winston, Joel
847	Wise, Patricia
765	Wise, Stephanie
1000	Withers, Janice
174	Wittenborn, Gary
172	Wogenstahl, Frances
804	Wolf, Mike
609	Wolff, Christian V.
94	Womack, Ken
511	Wood, Gwen
286	Wood, Jo Ann
44	Woodcock, Paul
1192	Woodruff, Dolores
1335	Woods, Margrit
1076	Woods, Retha Jane
1547	Woodward, Dennis M.
835	Woodward, J. R.
1080	Wortham, Michael B.
1024	Wray, William D
1616	Wright Jr., Richard C.
736	Wright, Alene
1617	Wright, Bonnie
1721	Wright, Jesse
16	Wyatt, Theresa J.
209	Xavier, James A
115	Yannet, Peter D.
1562	Yates, Scott
1044	Yeats, Kevin
137	Young, Alison
1526	Young, Craig B.
1348	Young, David Wilson
232	Young, Deborah
1636	Young, Norman
1540	Young, Ollie
615	Young, Ray
1377	Yunker, Rose
1470	Zaller, Kimberly
348	Zawiza, Thomas J
669	Zeigler, Lynn B
1773	Zernial, Jack
159	Zerr, Sarah J.
1374	Zewiwki, C
1456	Zimmelman, Ms. B.
1094	Zumbaugh, David M.
1303	Zummo, Carlita
806	de Vega, Sean
1036	van der Meer, Madge E.

Issue: 1 BIODIVERSITY

Issue: 1-1 Natural values - Plant, Animal & Communtity Diversity

Letter. 52 I want to see the forest floor covered with bushes, grasses, flowers and mushrooms
Letter: 400 I believe natural species of flora and fauna should be encouraged because in the long run they will be more efficient & sustainable
Letter: 1213 I hope the grasslands here in north Texas will be managed for biodiversity and re-establishing native prairie vegetation
Letter: 1235 I believe that native diversity is important and that it is vital to the survival of many plants, animals, and birds
Letter: 1265 public land MUST safeguard wildlife habitat and passive recreation
Letter: 1409 Would like to see a forest that would attract wildlife on its own
Letter: 1632 Special care must be taken to ensure that restoration and RCW management do not jeopardize specialized habitats and restricted plants Because RCW management in the Bannister area has been hindered by significant fragmentation in the past, further clearcutting in the area must be avoided
Letter 1665 I favor natural diversity because that's how Mother Nature would have it
Letter: 1666 please keep our public land as wild and natural as possible
Letter 1723 (pg 54 DEIS) of the disturbance factors that are listed or are implied when natural disturbances are mentioned, only fire has significantly been affected by humans Therefore we still have most of the natural disturbance factors working for us and must maximally take advantage of these to do any regeneration or other work we want done in the forest Human disturbance factors are not needed in great amount if a naturally evolving forest is what is desired
Letter. 1723 aquatic resources, I am opposed to use FW-011, 012, and 015 because they allow the use of exotics, pesticides and herbicides
Letter: 1723 MA-8d-01 - I am against any vegetative manipulation except for fire that occurred naturally
Letter. 1723 (MA-9a-11) I am opposed to "maximum native diversity" what is this? It is not defined You do not need to manipulate such areas
Letter. 1723 (MA-9b-11) I am against "maximum native diversity"
Letter: 1723 MA-8f-01 - do not manage vegetation Protect vegetation
Letter: 1723 Remove MA-8b-02 It is redundant
Letter: 1726 The forests of Texas contain great biological diversity This diversity should be protected for the enjoyment of present & future generations

Response. Comment noted

Letter: 1723 (pg 39 DEIS) I have a problem with the assertion under Ecosystem Management that ECS will be used to determine the most appropriate plant and animal species to manage This indicates to me that you will be looking at successional species and not the more climax types like the Southern Mixed Hardwood Forest This alters the ecosystems and keeps them perpetually in more early successional or seral stages rather than letting natural forces evolve the community This does not seem appropriate for genuine ecosystem management

Response The FS will use ecosystem management as the means to meet goals specified in the revised FP Ecosystem management is the means to an end It is not the end itself The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Letter. 1763 We are impressed by the emphasis on protecting biological diversity The use of the Ecological Classification System, the Management Indicators Table, and the identified Desired Future Conditions appear to be a more effective system for characterizing the range of ecosystem components than have previous systems

Issue. 1-1 Natural values - Plant, Animal & Communtity Diversity

Response: The IDT appreciates your support

Letter· 1453 sanitation and wildlife improvement cuts are also too common The terms give the impression that they are exceptional and unrelated to timber harvesting However evidence from past NF operations suggests that these cuts are quite typical and often used for sawtimber purposes

Response: Timber harvest is a tool for wildlife management Our wildlife program, that ensures habitat for both game & T&E species, will continue to utilize timber harvest for maintaining the populations of these species

Letter: 1472 I am concerned that such a large proportion of national forest acreage is devoted to single species management (RCW) at a time when more emphasis is being placed in biodiversity

Response. There will be few impacts on wildlife species such as deer, quail and wild turkey Some species of hardwood trees and shrubs may be eliminated or greatly reduced through prescribed burning and other midstory control measures This would be expected to result in a decrease in availability of mast on which some wildlife species are dependent However, some mast producing species will be enhanced with an open midstory Overstory mast producers, if present, would probably not be affected Because of the limited mast production capabilities of some midstory species and the fact that overstory mast producers will probably not be affected, the overall effect on mast dependent species is very likely going to be minimal In contrast, a majority of herbaceous native plants, animal and other species which occupy similar habitat to that of the RCW depend on the same fire dependent ecosystem as the RCW Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable

Letter 1633 FW standard FW-169 calls for the use of genetically improved seed or seedlings This is contrary to the mandate found in NFMA which states "preserve the diversity of tree species similar to that existing in the region controlled by the plan"

Response: The parent trees of genetically improved seedlings are Texas trees Sufficient parent trees are available to provide a diverse genetic base

Letter 1723 (pg 55 DEIS) the Affected Environment you generalize here This discussion conflicts with what is stated in Apps H & I which describe a more complicated OG environment than your vegetation groups (5 in all) would indicate

Response. The five groups described are the groupings recorded in historic records We do not agree that apps H&I conflict with this, rather they expand on it to describe the groups recognized today

Letter· 1723 (MA-8c-A1) what does "perpetuation of the mature semi-evergreen mesic forest" mean? Let Nature decide what will occur here not commercial timber bias No SPB cutting This destroys the scenic area
Letter: 1723 (MA-8c-B1) what does "semi-evergreen mesic forest" mean?

Response: This is explained in detail in the TX Natural Heritage Report

Issue· 1-2 Old Growth

Letter: 179 Old growth forests must be preserved for the sake of our planet and for future generations
Letter: 1614 If you continue management based on the demands of eco-fanatics you will create many stands of forest that are over-stocked and over mature, highly vulnerable to fire, insects or other disaster
Letter: 1627 I favor the old growth acreage supported in alternative 5 to provide for adequate habitat while maintaining sufficient harvest and other commodities
Letter: 1632 No timber harvests should be allowed in potential old growth areas
Letter: 1723 (EIS appendix I pg 4) flooding not only keeps invading species out it also acts as a disturbance factor which undermines trees and causes them to fall over during wet soil conditions or creates conditions where blowdowns are more possible thus creating natural gaps in the forest This is how floodplain species are able to regenerate

Issue: 1-2 *Old Growth*

Letter: 1723 (EIS appendix I pg 5) you say that single and multiple stem windfalls are the disturbance that is natural in bottomland hardwood groups you ignore this and require larger group selection (your definition takes it up to several acres) instead of group selection as normally defined of 1/4 acre or less or single tree selection which would mimic natural disturbances

Letter: 1723 (EIS appendix I pg 10-11) for Shortleaf Pine you limit hardwoods to 3/acre which I am against. I also oppose seedtree and shelterwood cutting and do not support cutting at 100 years This is supposed to be an oak dominated forest but you manage it mostly for pine

Letter· 1723 (EIS appendix I pg 11-12) Mixed Forest, I am opposed to seedtree and shelterwood and site preparation and planting I want natural regeneration The rotation age should be at least 200 yrs and no SPB used as an excuse to cut good trees I am opposed to any dia limit which trees cannot grow beyond without being cut The 125 yr rotation is too short

Letter. 1723 (EIS appendix I pg 14) for LLP I am opposed to shelterwood and want group selection (1/4 acre of less in size) or single tree selection methods to regenerate this forest I want a 300 yr rotation and not 250 yrs and no excuses about SPB to cut at 150 yrs or less I want natural regeneration only

Letter: 1723 (EIS appendix I) Sweetbay-Swamp Tupelo-Red Maple group overstory trees can be large I want no management activities period I do not want anything done to enhance wildlife or other resources There is zero excuses for cutting this rare ecotype

Letter: 1723 (MA-8b-41) I am totally against any cutting for SPB in OG areas

Letter. 1723 (MA-4-11) I do not want portions but the entire streamside zone set aside for OG corridors

Response: Comment noted.

Letter: 1605 Recommendations (MA-1) Leave a substantial component of older trees in each stand to live until natural death and to stand on until natural fall, for the benefit of RCW expansion and structural and vertical diversity

Response: Recommendation noted

Letter: 1308 *with alt 2, old growth increases over current levels and is very similar to alts 3, 4, 4a, 4b and 5 which, in my opinion, is not excessive* Again, alts 6 and 7 promote excessive old growth which will undoubtedly increase SPB problems in the future

Response. The IDT appreciates your support

Letter 52 I want to see "old growth" trees

Letter 52 I want to see trees of different sizes and shapes, different species of trees, and

Response Come to the NFGT

Letter· 1310 *The DEIS and Draft Plan count all acreage in SMZ's as old growth in alt 4B , yet the DEIS and Plan indicate that only "some" of SMZ's (MA4) will be* allowed to develop into old growth The Plan's standards and guidelines clearly allow for unlimited, unregulated tree harvest under the guise of sanitation, salvage, or alleged wildlife habitat "improvement " Conceivable under such guidelines, MA4 would produce no old growth areas at all

Letter· 1605 MA-4-11 - Old growth allowed to develop along streamside zones should not be counted toward old growth goals, unless the various allowances for timber removal provided in MA-4 are eliminated

Response· SMZs are classified as potential old growth Old growth characteristics should develop in SMZs over time, even in areas where limited management activities occur After analysis, some areas in SMZs will be designated as restored old growth

Letter: 1310 The failure to include ephemeral streams in MA 4 means that large areas of the forest will have no old growth and no hardwood-rich riparian areas

Issue 1-2 Old Growth

Response: We disagree The Plan will adequately provide old growth and riparian areas throughout the NFGT

Letter: 1604 Recommendation - MA 1 Leave a component of older trees in each stand to live until natural death and to stand on until natural fall, for the benefit of RCW expansion and structural and vertical diversity

Letter: 1605 Recommendation Leave a substantial component of older trees in each stand to live until natural death and to stand on until natural fall, for the benefit of RCW expansion and structural and vertical diversity

Response: Recommendation noted

Letter: 1252 We have no business cutting old growth or mature forests in Texas

Letter. 1723 (MA-8b-01) if these areas will be designated potential OG areas how will you ensure they are not degraded by activities that will be allowed?

Response: Management areas classified as potential old growth are not scheduled for timber harvest Older stands in other management areas will be evaluated before entry, and management activities may be halted, limited, or redesigned dependent on the current and future old growth needs

Letter: 1605 MA-2-01 - Because RCW is an old-growth dependent species, substantial areas of old growth should be provided in MA2 in addition to colony clusters A portion of these additional areas could eventually be logged for large-diameter logs, provided that abundant old growth was left for the RCW

Response: Old Growth conditions do not equate to RCW habitat RCW utilize a range of age classes in pine stands for foraging and nesting Direction in MA-2 provides this habitat requirement, and emphasizes fire as the preferred method of maintaining pine dominated uplands with an open understory Herbicides, mechanical and hand tools may all be used if fire does not create the DFC Both EAM and UAM will be required in the management of RCW habitat to obtain the desired results

Letter: 1618 None of the plans provide enough pine timber to lower the average age of timber to a healthy age level It seems to me that we should be cutting all of the old mature and diseased timber with an average age left being not more than 40 to 50 years old When the US government bought the land that has become the USFS in Texas, one of the main concerns was a reliable timber supply

Letter: 1625 We should save our old growth forests to protect and enlarge our wildlife habitat - and to give our grandchildren the opportunity to see and enjoy what these wonderful old forests were really like

Response: Old, mature trees are an important resource on the forest Maintaining a healthy forest while providing for old growth needs is one of the priorities on the NFGT

Letter: 1632 Use of prescribed fire (in OG) must be looked at on a case by case basis, taking into account species, site needs, and constraints

Response: That is our intent

Letter. 1605 MA-1-01 - Provide for some old growth allocations in the Upland Forest Ecosystem (MA1) Stands which are "approaching maturity "are not sufficient Old growth allocations should be provided for forest ages beyond the USFS-defined maturity periods

Letter: 1632 Numerous sites on the forest occur within historic longleaf range but currently have stands of shortleaf or loblolly greater than 75 yrs of age Any such stands should be inventoried for OG characteristics prior to any ground disturbing activities Potential OG sites should not be disturbed for restoration (or any other purposes until the OG issue is resolved)

Response: All stands 100 years and older will be evaluated for old growth character prior to any ground disturbing activities Decisions will then be made based on this site specific evaluation and DFC and needs of the forest

Letter: 1632 OG forests are being clearcut or otherwise regenerated by even-aged techniques at the time when the FS lacks an adequate inventory of potential OG sites, a working definition of OG and a comprehensive OG policy

Issue: 1-2 Old Growth

Letter 1632 lacking from the (EIS) App I is a more precise definition of OG and an inventory process to determine if OG currently exists on the Forest outside of Special Management Areas I recommend reviewing any stands 75 years and older for old-growth potential No soil disturbing activities should be allowed in these stands until definitions are adopted and stand structure has been studied to determine whether the area should be retained as old growth

Letter: 1632 I strongly oppose the over-riding notion that management of old growth is synonymous with an anthropomorphic disturbance regime of periodic timber harvests and shelterwood cuts

Letter: 1723 You talk about regenerating mature and over mature timber which means we will never really have OG in TX NFs

Response: The Forest is currently developing its old growth policy The NFGT plans to provide areas of managed and unmanaged old growth Many special areas are not scheduled for regeneration

Letter. 1632 OG policy should quantify a specific number of acres that will actually be in unharvested OG, rather than just potential OG implies the lack of anthropomorphic disturbance but acknowledges that natural disturbance will influence stand structure I would like to see a minimum of 20% of the Forest in unharvested true OG The rest of the Forest should be managed to retain some degree of OG character including 1)lack of fragmentation 2)Minimum of 20 large diameter trees (20" DBH) per acre, 3)A minimum of 12 snags and wildlife trees per acre

Letter: 1636 It is recommended that the old growth acreage of alt 6/7 be adopted, again because the RCW problem is to a great degree an old-growth problem

Response Recommendation noted

Letter: 1636 Could it be possible a NFGT market plan could be worked out where old growth and revenues are maximized?

Response: The plan provides for a mix of goods and services

Letter· 1671 Because mgmt guides for RCW, bottomlands, SMZs, wilderness & the W&S river corridor, many forest stands will be allowed to progress & increase toward old growth (OG) status Development of OG forests should be optimized in the selected alt , while keeping mgmt flexibility to address specific needs of individual stands As correctly stated , allowances for OG will likely have adverse effects on commodity production in the short term, but will increase long-term productivity, overall species richness & viability of less common plant and animal species The importance of including provisions for OG has been stated in previous correspondence by this Dept OG or older growth is identified in the computer data base (DB) As older stands occur and are located , this DB should be updated Plan should include provisions for updating the public on OG stands w/o referring to a DB Plan should better reference the 100,000+ac coming into OG category 100+yr

Response: The NFGT plans to continue its inventory and evaluation of older stands while developing an old growth policy

Letter: 1605 MA-7-18 - Allocation of wilderness as old growth must be accompanied by the restriction that the area is never to be harvested, not even for SPB control

Letter: 1679 The Draft FP does not specify that OG in wilderness areas will never be harvested The use of motorized vehicles and boats in special areas should be eliminated

Response: No trees in wilderness in Texas have been harvested or are scheduled for harvest Trees may only be cut in emergency situations

Letter 1723 streamside and other so-called OG zones will not provide linkages because they will be cut in and will be fragmented

Response: SMZs are protected in the Plan

Letter: 1723 (pg 29 DEIS) I dispute your assertion that RCW colonies are old growth

Letter. 1808 RCW habitat should not be considered OG habitat because, unlike wilderness and special areas, it received intensive hardwood midstory removal Additionally, if the USFS plans to manage ecosystems, it is important to establish contiguous OG forests It is recommended that the standard for MA-1 and MA-2 regarding OG be rewritten to allocate OG corridors through RCW habitat management areas if necessary

Issue: 1-2 Old Growth

Response RCW colonies are now not included as old growth, though old growth character may develop in HMAs

Letter. 1723 You need to have some definite minimum portion of each management area set aside for potential old growth

Response: Each management area is classified by the old growth designation Classification is based on management area emphases

Letter: 1723 (MA-1-01) this old growth provision is not acceptable It only allows "approaching maturity" and not real OG

Response: There is no OG allocated to MA-1

Letter 1723 (EIS appendix I) you have several tree species listed that do not occur naturally in Texas Why were these trees listed for Texas?

Response Thank you for bringing this to our attention

Letter: 1679 There is no recognition of the loss of growth potential Trees that have grown for several years, but not reached usable size are ignored These trees have used soil nutrients, and will have to start over in a new rotation

Response: This is calculated in the growth yield models used

Letter 1723 (EIS appendix I pg 8) when listing tree species that exist in the so-called Dry and Dry-Mesic Oak-Pine Forests you need to add American Beech and Southern Magnolia you are combining two moisture regimes and types of forests together and I have never heard of this being done like this I do not agree with limiting large hardwoods to no more than three per acre The diameter limit is too small at 28" rotation age is too young at 150 yrs You are managing for a disclimax dominated by Loblolly even though you call this an Oak-Pine Forest

Response The source document for the OG definitions shows the OG cross walk for Beech-magnolia as Coastal Plain Upland Mesic Hardwood Forests Management strategies for OG have been eliminated in the final documents

Letter: 1632 EIS App I needs to be abandoned altogether since it does not reflect true OG policy and managment. App I instead is a prescription for long-rotation, even aged management and periodic commercial thinning Commercial thinning and shelterwood cuts would prevent the multi-layered canopy and uneven-aged conditions characteristic of OG

Letter 1723 (EIS appendix I pg 3) you talk about using shelterwood for 300 year rotation to simulate disturbance But this does not simulate natural disturbance because in natural disturbance the entire stand would not be lost and no site preparation which destroys the leaf litter and top soil layer would occur the 2-4 acres to be cut is too large to allow if you are to simulate single tree fall gaps You are not simulating natural disturbance but still allowing even age management

Letter: 1723 (EIS appendix I pg 7) seedtree or shelterwood are proposed here for the regeneration method for Shortleaf Pine when selection management can be done to more naturally mimic disturbance You artifically limit SLP to a minimum 100 yrs of age and then you can cut real old SLP of over 200 or more years will never occur with your cutting methods

Response Management strategies have been eliminated from the final OG appendix

Letter 1723 (EIS appendix I) Table 1, how was potential OG determined? Why is there not more? Why is there no American Beech-Southern Magnolia acres in OG? Why are not all the bay acres in potential OG?

Response: These are the acres of unsuitable lands by FT as is explained in the footnote for the table

Issue: 1-2 Old Growth

Letter: 1723 (MA-8b-04) you cannot manage these areas as OG if you allow for SPB cutting

Response.
SPB control strategies will be designed to protect old growth characteristics

Issue: 1-2-1 Snags

Letter: 1632 there is a serious shortage or total lack of trees, living or dead, suitable for wildlife perches, cavities, roosts, dens, and nesting and food caches

Letter: 1632 2 hardwoods per acre as proposed in the Plan is vastly inadequate At least a dozen trees per acre with immediate wildlife potential should always be retained

Response: Comment noted

Letter. 1632 Adequate snag and hardwood structure must be retained for wildlife needs

Response The IDT agrees The final revised Plan has been amended to reflect this

Letter: 1723 FW-202 - where did you get the information to set the standards for the number of snags and den trees and downed trees per acre?

Response: See MI table, plan chap V Snag density increases with stand age, old growth has a greater snag objective than young stands

Letter: 1723 (FW-073) what number of vacated trees should be left?

Response: This will by necessity be a project-level decision considering such factors as species, size, number available & public safety

Issue: 1-3 Special ecosystems - riparian & streamside zones

Letter 277 protective corridors around streams should be a priority

Letter 298 I also urge an emphasis on streambed protection The recent heavy rain & flooding can be catastrophic if adequate zones of timber and ground cover are not maintained in creekbeds

Letter: 1723 (pg 16 DEIS) I also oppose site preparation and clearcutting and cutting in streamside zones for SPB and cutting in scenic areas and mineral drilling in scenic areas

Letter 1723 (pg 35 #1 Plan) I am opposed to any cutting in riparian areas at all

Letter. 1723 (Pg 45 DEIS) Alt 6 & 7 are the best alternatives because they protect more riparian habitat

Letter: 1723 (MA-3-43) you need at least 200 ft for a protective zone from oil and gas drilling for perennial streams, 100 ft for intermittent streams and 75 ft for ephemeral streams

Letter 1723 (pg 122) these streamside areas must be managed for OG, wildlife corridors for migration and dispersal, aesthetic corridors, trail corridors, buffers for interior forest species and other important purposes

Letter: 1723 (MA-4-101), I am against ponds, seismic surveys and blanket safety hazards loopholes that the FS can use to destroy and log riparian areas

Letter 1723 (MA-4-102) I am against greentree reservoirs and ponds and flood control structures since this area is a natural flood control area

Issue: 1-3 Special ecosystems - riparian & streamside zones

Letter. 1723 MA-4-124 - Greentree reservoirs can only make riparian areas more disturbed
Letter: 1723 (MA-9a-131) I support no building or campsites in the 100 yr floodplain and removing those that exist there now
Letter: 1723 (MA-9a-142) remove "as deemed appropriate" and always protect emphemeral streams flow, period
Letter. 1723 (MA-9b-142) remove "as deemed appropriate" and protect streams period

Response: Comment noted

Letter. 614 I find troubling, contract loggers logging right up to streams and rivers on Federal property
Letter. 1310 and SMZ's of adequate width and total protection from timber harvest, along with ample scenic and other special off-limits to logging are the best, most effective and most cost-efficient way to provide vegetative and habitat diversity throughout the forest This can be done and still leave 60% of the forest open to commercial logging
Letter· 1310 Reducing SMZ minimum widths because ridgetops come closer to streambanks than the minimum width is not justified since one of the objectives of the SMZ is to preserve biologically rich and scenic old growth
Letter: 1435 The streams are the most sensitive areas in the forest and should be protected with a adequate buffer 150 ft on each side of perennial streams and 100 ft on each side of intermittent streams This is especially important to protect water quality and soil erosion
Letter 1568 Suggest that absolutely no logging or burning be allowed within 800 feet of streamside areas
Letter: 1631 Streams should be protected from logging and burning by establishing protected streamside corridors 400 feet wide for perennial streams, 200 feet for intermittent, and 200 feet for ephemeral streams
Letter: 1774 No grazing 300 ft of streamside zones

Response Water quality is maintained on the NFGT by implementing S&G that require protection zones adjacent to those streams that are identified as needing protection Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality In some situations, wider protection zones would be beneficial to wildlife and provide greater protection against blow-downs

Letter 1310 Minimum widths under any and all circumstances are 150 feet on both sides of perennial streams, 100 feet from intermittent streams and 75 feet from ephemeral streams Where the extent of the floodplain or of hydrophytic vegetation is greater than these widths, the SMZ should go up to the limit of the floodplain or hydrophytic vegetation
Letter: 1605 Reducing SMZ minimum widths because ridgetops come closer to streambanks that the minimum width is not justified since one of the objectives of the SMZ is to preserve biologically rich and scenic old growth
Letter: 1605 Minimum widths under any and all circumstances are 150 feet on both sides of perennial streams, 100 feet from intermittent streams and 75 feet from ephemeral streams Where the extent of the floodplain or of hydrophytic vegetation is greater than these widths, the SMZ should go up to the limit of the floodplain or hydrophytic vegetation

Response· For MA-4 SMZs, the FP states that the boundary for the MA will include all riparian areas dominated by obligate hydrophytic vegetation

Letter: 1310 Recommendation No skidders or other logging equipment of any kind will be allowed within SMZ's.
Letter: 1605 Recommendation No skidders or other logging equipment of any kind will be allowed within SMZ's

Response. S&G limit the use of mechanical equipment within SMZ's Mechanical equipment can not be totally excluded from SMZ's There are situations that require limited access of mechanical equipment

Letter: 1310 Recommendation SMZ's need to be designated in the Plan for ephemeral streams
Letter: 1605 SMZ's need to be designated in the Plan for ephemeral streams

Response Protection zones for ephemeral streams are discussed under Forest-wide S&G

Issue: 1-3 Special ecosystems - riparian & streamside zones

Letter: 1310 Recommendation All streams, including ephemeral streams are inventoried and mapped
Letter: 1605 Recommendation All streams, including ephemeral streams are inventoried and mapped

Response: The Forest is in the process of mapping and classifying streams including Order I streams (ephemerals)

Letter: 1605 FW-021 - Provide protection for intermittent streams of at least 100 ft vs proposed 66 ft Provide protection for perennial streams of at least 150 ft
Letter: 1605 FW-021 - Protection needs to also be provided to ephemeral streams (75 ft.), and should be included in MA-4 management
Letter: 1608 Provide for a protected corridor of 150, 100 or 75 feet on each side of a perennial, intermittent or ephemeral water body respectively In these corridors there should be no cutting (except hazardous trees) or salvage, no SPB treatment, no prescribed burning and no removal of minerals or oil & gas This would provide visual quality, encourage old growth, protect hardwoods, provide dispersion habitat, improve mast producing wildlife habitat and improve erosion control

Response. Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality S&G will not allow indiscriminate timber harvesting activities and prescribed burning within protection zones

Letter: 1655 FW-188 - The management standards for protecting wetlands that are less than 10 acres in size should also address the management practices on the surrounding habitat in order to protect the natural processes (ie, fire, hydrology, etc) that are important for the maintenance of the wetland community

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter: 1723 MA-4-112 - ephemeral streams also need this protection In addition more protective contract stipulations are needed
Letter: 1723 (FW-021) the zone to protect streamsides is not only not wide enough but you allow SPB cutting

Response: Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality This is reflected in the revised MA-4 management emphasis and area identification SPB will be controlled in the area within the standards for IPM described in MA-4

Letter: 1655 FW-021 - and MA-4-12 Maintaining existing woody vegetation along streams within an arbitrary distance throughout the forest does not take into *account the variability of the landscape and natural vegetation patterns The standard should be revised to allow the judicious vegetation* manipulation to restore the native plants and plant communities that occur along streams on a site-specific basis This action would be guided by the ECS and DFC of the ecological unit

Response: This standard has been revised and is incorporated in the mgmt emphasis & area identification of MA-4

Letter: 1723 (pg 47 DEIS) it is particularly of concern that you allow SPB control in and riparian areas

Response: SPB infestations will normally be allowed to run their natural course, unless a site-specific analysis indicates one of the conditions listed in FW-4-42 exists

Letter. 1617 *Stop using loopholes for going in and cutting in these and other fragile areas*

Response· Timber is only harvested in SMZ's when it will benefit another resource This may include regenerating the area and establish the tree species necessary to meet the DFC

Letter 1622 some of the larger ephemeral stream sites should receive consideration comparable to that proposed for intermittent streams Treating some of the larger ephemeral streams as perennial streams would enhance both plant and animal diversity including hardwood species, rare plants, neotropical bird migrants and provide more quality habitat for recreational uses such as hunting, birdwatching, hiking, nature photography, etc

Issue: 1-3 Special ecosystems - riparian & streamside zones

Response: All ephemeral streams are classified as Order I streams This means they are on upland portions of the watersheds or subwatersheds Normally these areas don't have the same vegetation components as an intermittent or perennial stream Areas adjacent to ephemeral streams normally have the same vegetative component as upper slopes and ridge tops Therefore there is not a need to manage the areas adjacent to the ephemeral streams any differently than the upper slopes and ridge tops Those ephemeral stream designated as needing protection will have a zone of adequate width and minimum access for mechanical equipment

Letter: 1671 Discussion in the Revised LRMP and DEIS concerning streamside management zones is not clear in regard to implications for protection of bottomland hardwood forests and riparian vegetation As indicated by the Service, these zones actually encompass the alluvial bottoms associated with 100 yr floodplains in addiion to vegetation adjacent to perennial and intermittent streams These are the areas identified by the Dept 's Tx Wetlands Plan and in many situations will exceed the Service's minimum parameters of 66 and 100 ft . transitional zones between the floodplain areas and uplands serve to protect the integrity of travel corridors Evaluation and selective incorporation of these areas will also reduce effects of habitat fragmentation, and protect the bottomland corridors from disturbance

Response: Most bottomland hardwood species will not be harvested or cut from the SMZ unless management of a particular resource determines that need

Letter. 1679 The Draft FP does not specify the long-term and cumulative effects of even-age cuts on down stream siltation, chemical damage by herbicides and pesticides, and flooding caused by increased water yields

Response. It is true that removal of vegetation from upland sites will cause an increase in water yield However, most suspended sediment will be trapped by the protection zone (SMZ) for each stream or drainage that is designated for protection Therefore, siltation from the uplands is held to a minimal There is not a great potential for damage caused from the use of herbicides because herbicides used on the NF are not soil active Although removal of vegetation will cause an increase in water yield There's not enough vegetative manipulation in any given watershed that would result in flooding

Letter 1679 The Draft FP does not reflect the impacts of increased water yields Increased water yields cause soil erosion, channel erosion, stream sedimentation, water table/groundwater recharge modification, lowers acidity in streams, removes nutrients, causes stream pollution, fisheries damage, the loss of sensitive species, and exhaberates downstream flooding and siltation

Response: Increased water yields are not having significant impacts Although there are slight increases in erosion and sedimentation it is not enough to create a significant impact to the aquatic habitat Removal of vegetation normally does not have a significance on ground-water recharge areas because these areas have deep sandy soils with high infiltration rates Our baseline water quality monitoring has not indicated a lowering of stream acidity Most of the sediment that transport nutrients is trapped in the SMZ's

Letter 1679 The Draft FP offers inadequate protection to SMZ These should be protected for 150 ft on either side of perennial streams, 100 ft from intermittent streams, and 75 ft from emphemeral streams There should be no cutting within these protected zones SMZ should be treated as a separate issue The DFP does not explain the difference in acreage between the 1987 FP and this plan Unneeded bridges and culverts should be removed, and new ones should not be constructed SMZ's should not be narrowed if ridges come in closer, ridgetops should be protected if they are that close to a stream Skidders should not be allowed in SMZs SMZs should be inventoried and SPB cuts should not be allowed Prescription burning should not be allowed in SMZs SMZs should be clearly marked with the paint on the side away from the stream Logs should be left in the stream unless the stream is a frequently canoed stream SMZs should be inspected periodically and trash cleaned up

Letter: 1801 should give more protection for streams Streams are vitally important for fish and wildlife No logging or burning should be allowed within streamside areas (150 feet from perennial streams, 100 feet from intermittent, 75 from ephemeral) As mandated by the NFMA, the plan must ensure their protection

Response: Water quality is maintained on the NFGT by implementing S&G's that require protection zones adjacent to those streams that are identified as needing protection Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality In some situations wider protection zones would be beneficial to wildlife and provide greater protection against blow-downs SMZ's are protected from fire by plowed or hand-raked firelines There are instances where skidders are allowed within SMZ's to remove trees that can not be cabled out In some instances, cabling trees out of SMZ's does no more damage than skidding All SMZ's are plainly marked with paint that is visible to the operator If a tree is felled in a stream and its determined that the tree altered the flow of the stream, the tree is removed

Issue 1-3 Special ecosystems - riparian & streamside zones

Letter. 1723 can also cause nonpoint source pollution especially when cows are allowed in riparian areas as this plan allows (refers to grasslands)

Response: We have S&G that don't allow activities that will cause the cattle to congregate in the riparian area thus lessening the potential impacts

Letter 1733 Projected stream sediment loading - 4B appears to have a higher cumulative effect over time than alt 3 (chart p 119) if you graph the slope from period 1 through period 5 to period 10

Response: Alternative 4B has a higher percentage of uneven-aged management Uneven-aged management basically need open road network which produce a greater sediment load

Letter 1723 MA-4-113 - skidders and logging equipment should never be allowed in riparian areas period
Letter 1765 Logging shall not cross these (75 ft along both sides of all streams and trails) protected corridors
Letter 1774 No cutting except for hazard trees inside streamside zones

Response: Logging normally does not occur within the protected corridors unless its needed to control SPB or remove damaged trees

Letter 1765 Logging must be limited not crossing the stream

Response: Stream crossings are held to a minimum When crossings are necessary state approved BMPS are implemented

Letter: 1723 (pg 121) protecting wetlands 10 acres or larger is not good enough All wetlands need protection

Response· All jurisdictional wetlands are protected through FW S&G's

Letter: 1723 (Pg 121) compatible multiple uses must be defined

Response Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Letter: 1310 The DEIS completely ignored the well-known studies of James G Dickson, the FS's own researcher, based in Nacogdoches, right in the heart of east Texas Dickson's studies also showed that in place of squirrels what you get in unprotected SMZ's are various species of mice and rats that would not be found there in natural SMZ's Dickson also pointed out the benefits of protected SMZ'S for wild turkey, deer and songbirds
Letter: 1605 The DEIS completely ignored the well-known studies of James G Dickson, the FS's own researcher, based in Nacogdoches, right in the heart of east Texas Dickson's studies also showed that in place of squirrels what you get in unprotected SMA's are various species of mice and rats that would not be found there in natural SMZ's Dickson also pointed out the benefits of protected SMZ's for wild turkey, deer and songbirds

Response: Research information from studies you refer to were an integral part of SMZ delineation Numerous reviews & comments of drafted stds by USFS research personnel including Dr Dickson, were incorporated in the direction found in MA-4

Letter 1605 General - The USGS quadrangles should be considered only as a starting point for the determination of riparian zones needing protection On-site inspections at several different times of the year, not only during dry times must be performed before reaching conclusions

Response: Riparian zones are based on the classification of the streams, be it ephemeral, intermittent, or perennial & not USGS quadrangles

Letter 1605 MA-4-12 - Revegetation with non-native species should be used and justified on a case basis only, and only when no reasonable native alternative is available When non-native species are employed, a clear schedule for restoring native plant communities must be developed prior to the use of the non-natives

Response: Non-native species are used primarily to obtain a vegetative cover to prevent erosion After the area is stabilized, native species are re-established

Issue. 1-3 Special ecosystems - riparian & streamside zones

Letter: 1723 (pgs 122-123) BMPs are too weak to ensure that streams are protected I oppose cutting in these areas

Response· Research data was used to determine the width of streamcourse protection zones

Letter· 1723 allowing cows and oil and gas activities breaks the standard (MA3-78)

Response: Range activities are held to a minimum Oil & Gas operations are controled by Federal Laws

Letter: 1723 you are proposing 100 fts on each side is totally inadequate and you need at least 200 ft on each side of a perennial stream, 100 ft for intermittent streams and 75 fts for ephemeral streams is inadequate and will not be sufficient for wildlife and OG (SPB-10)

Response: This standard from the SPB EIS states "As a minimum, riparian areas will extend 100 ft from the edge of all perennial streams " Riparian areas in this revision will include areas dominated by obligate hydrophytic vegetation

Letter: 1723 (pg 115) MA-3-04, what does "maintain" mean? Does this mean the areas will be cut? How will you determine what the natural streamside zone width is for grassland streams? You need to protect the entire riparian area since grassland streams are generally much smaller and their protection more important for wildlife because there are fewer of them

Response: This will be managed as restored to meet the DFC as determined by the ECS These streams without riparian vegetation will have minimum widths as specified in the plan

Issue: 1-4 Management indicators

Letter· 886 I believe that the forests are sick Something is wrong out there, there ought to be a lot more wildlife than there is

Response The FS manages for viable populations of wildlife that occur naturally on NFGT The environmental impacts on wildlife of the different alternatives are analyzed in the EIS

Letter. 1808 Chapter V, Table 2, p 241 Table 2 should be corrected to remove the dwarf salamander from the list for the "Longleaf-pine Woodlands & Savannas" and include the pileated woodpecker (Dryocopus pileatur) in the "Bottomlands Streamsides" category Neotropical and breeding birds identified by the USFS in their proposed "Landbird Strategy" should be added to the management indicator list

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter 1640 All alts use the same management indicators, but the effect on the indicators for each alt hasn't been analyzed for amount and quality of habitat and animal population trends as required by NFMA regulation 219 29a2

Response This information is in the computer analysis of the Alternatives & was utilized to describe effects in EIS, Chapter III

Letter 1671 Accomplishment of the monitoring projected in this plan does not appear practical given anticipated budget and human resource limitations If a practical way of monitoring the systems cannot be found, then the indicators and monitoring proposals should be reduced to a reasonable load that the USFS can accomplish Perhaps a solution would be to establish a statement in the Plan linking the desired management indicators to each respective vegetative group The vegetative group is providing high quality habitat, then the management indicators should be healthy and thriving

Response: The EIS has been changed to reflect your concerns

Issue: 1-4 Management indicators

Letter: 1723 (pg 95 DEIS) why talk about quail when it is not an important forest bird It is a brush and grassland species for the most part You should not naturally find much quail in the NF because the bird does not prefer forests

Response: Quail serve as a MIS for both grasslands & early succession forest Mgmt of open longleaf pine-little bluestem ecosystems, also provide excellent quail habitat

Issue: 1-5 Texas natural heritage & other sites

Letter: 1438 If biodiversity is one of the objectives of the plan I would think that clearcuts placed strategically throughout the forest for wildlife habitat enhancement would be a very positive management tool

Response: The IDT appreciates your support

Letter: 1632 Maintain and promote all current high-quality examples of the various communities present on the forest This should include, but not be limited to, all sites listed for protection by the Texas Natural Heritage Program inventory for NFGT All sites should receive protection in their entirety with special management status

Letter: 1671 In appendix B, p 84 of the EIS, there should be explanation that the Plan will manage inclusions such as the Heritage sites as separate from the entire compartment, and will treat them accordingly

Response. The IDT agrees S&G's have been added to the biodiversity section(s) to reflect this

Letter: 1723 (pg 4 DEIS) you need to protect inclusions less than 10 acres in size I see no evidence as you portray that this plan does this The site specific decisions do not seem to recognize such small areas

Response: Inclusions less than 10 acres in size are protected through FW Standard FW-025

Letter: 1632 MA-4-63 - well sites located within 66 or 100 feet of streams result in problems similar to even-aged cuts near streams Such close proximity offers little protection from residual drilling fluids, salts or petroleum entering water sheds Keep well sites at least 300 feet from streams

Response S&G's require Federal oil & gas well sites & containment facilities to be located outside of SMZ's

Issue 1-6 General

Letter: 1632 The FS needs to make commitments in the plan to maintaining greater habitat diversity than the Draft would allow for and quantify how that will be done The FS needs to follow up on the ECS with a working direction for implementation Estimates must be made of impacts from midstory removal/TSI over time in acres treated and total stems treated

Response: Comment noted

Issue: 1-6 General

Letter: 1632 Current hardwood and snag allowance are insufficient to meet requirements for a diverse and healthy population

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter. 1310 The FS attempt to provide biodiversity through the age classes of even-aged management is a failure It fails to look at biodiversity in a regional context It fails to take into account the huge number of permanent openings

Letter. 1310 MA2 management is too much single-species management rather than ecosystem management

Response· There will be few impacts on wildlife species such as deer, quail and wild turkey Some species of hardwood trees and shrubs may be eliminated or greatly reduced through prescribed burning and other midstory control measures This would be expected to result in a decrease in availability of mast on which some wildlife species are dependent However, some mast producing species will be enhanced with an open midstory Overstory mast producers, if present, would probably not be affected Because of the limited mast production capabilities of some midstory species and the fact that overstory mast producers will probably not be affected, the overall effect on mast dependent species is very likely going to be minimal In contrast, a majority of herbaceous native plants, animal and other species which occupy similar habitat to that of the RCW depend on the same fire dependent ecosystem as the RCW Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable

Letter· 1671 Draft Plan, p 124, MA-4-12 Maintain existing plant communities This should be clarified For example, if burning is conducted effectively in longleaf management units, then the baygulls enclosed will shrink Is this consistent with the overall goal? Perhaps the standard should be stated as, "Restore and maintain existing plant communities "

Response This standard has been clarified in the final document

Letter 1453 minimum wetland and bog area, currently described as 10 acres, is too large Many significant wetland/bog areas are an acre of less in size, despite Army Corps of Engineers' general permit waivers for these smaller areas

Response Inclusions less than 10 acres in size are protected through FW Standard FW-025

Letter· 1640 The Ecological Classification System (ECS) by which all alternatives will be managed seems to be missing

Response: The ECS is described in the Plan, Appendix A

Letter: 1409 Revegetation of disturbed areas should be done by the most efficient means to stabilize soil and decrease erosion Use native plants where practical to do so There needs to be a balance of pine and hardwoods Hardwoods are stately trees with so much character Pines provide the wonderful aroma of the woods Both are needed to provide homes for other plants and animals

Response The IDT agrees The revised Plan allows the flexibility necessary to achieve the DFC

Issue 1-7 Ecosystem Mgmt

Letter: 176 All biological life is interconnected Men need plants, plants need bacteria, bacteria need other life forms, etc The biosphere is more CAN NOT BE SEGMENTED INTO 5 ACRE PLOTS Nature does not respect our property lines

Letter· 842 the FS try growing kenaf for "paper pulp "

Letter 855 many conservatives such as myself believe strongly in the protection of our environment because of the ecological significance of the regions

Letter 1262 We must use more ecological safeguards in the management of our national forests

Issue 1-7 Ecosystem Mgmt

Letter· 1451 Let's provide for true eco-system management mostly by natural means

Letter: 1632 FS prescriptions for even-aged cutting in longleaf are contrary to natural stand structure and should be abandoned LL pine is a long-lived and stable forest type, seldom experiencing the type of disturbance associated with even-aged cutting Wind and tornadoes are unimpaired natural processes There is no need to accelerate return interval for these events with even-aged cutting systems

Letter· 1632 Extensive biological surveys should be conducted prior to restoration work to ensure that biodiversity is protected The Clayey Uplands and Sandy Uplands should be reviewed vegetationally to allow for management of shortleaf-oak/hickory and mesic types as well as longleaf

Letter 1632 Wildlife "enhancement" programs should avoid eradication of species such as elm, sweetgum, and red maple Their buds and flowers are browsed heavily by squirrels in the spring

Letter 1723 There is almost no tall grass prairie left in Texas one opportunity to restore a relatively large area of grassland to native tall grass prairie

Letter 1723 (pg 71 DEIS) saying you will allow "some areas of tall grass to develop" Why some areas? How much is some? What percentage of the total grasslands acreage are we talking about with regard to this statement? I want all grasslands in the National Grasslands, excluding riparian or other obviously different ecotypes, to be managed as native tall grass prairie

Letter: 1723 National Grasslands must be managed just as carefully as National Forests for native ecosystem

Letter 1723 (pg 44 DEIS) I am against put and take stocking of exotic fish like Rainbow Trout in Texas National Forests

Letter 1723 FW-011 - This is not ecosystem management in my book

Letter 1723 (pg 70, DEIS) the inclusion that you list here are not varied enough to meet the Southern Mixed Hardwood climax that Quarterman and Keever discussed You also often list the Loblolly Pine as a dominant when it is successional to the Southern Mixed Hardwood forest that is dominant in the SHNF

Letter 1723 (pg 74 and 80, DEIS) I am glad to see that you do not plan to cut the Bay-Shrub Wetlands for timber and for any purpose

Letter 1723 (pg 75, DEIS) I do not agree with your classification of Xeric and Dry-Mesic Oak-Pine forest

Letter 1723 (FW-061) if you really are to ecosystem manage then you do not need to say you will use it because these benefits will occur as a result of ecosystem management

Response. Comment noted

Letter. 354 You talk about "ecosystem management," but 70% of the forest is pine-monocultures - NOT a true ecosystem'

Response· The FS will use ecosystem management as the means to meet goals specified in the revised FP Ecosystem management is the means to an end It is not the end itself The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Letter: 1460 despite FS phrasing and publicity, pure-pine stands/plantations are NOT an ecosystem But if they were, SPBs would be an integral part of the natural balance The FS is deluding itself and the public by considering SPBs controllable, especially at epidemic population levels

Response SPB is a part of natural ecosystems in the southern US, and SPB and pines have co-evolved The FS is not attempting to control all SPB or prevent epidemics The FS is reducing impacts of SPB by reducing SPB hazard and by promptly controlling infestations

Letter: 1632 The Clayey Uplands and Sandy Uplands also contain soils that tend to defy currently accepted vegetation types, namely the Moswell, Raylake, Herty, Rosenwall, and Lacerda soil series No hardwood eradication should occur on these soils Further study needs to be done prior to any serious vegetational manipulation for the above-mentioned soils

Issue: 1-7 Ecosystem Mgmt

Letter: 1632 Soil series which need to be reevaluated for vegetational typing include Sacul, Lacerda, Woodtell, Cuthbert, Diboll, Herty, Moswell, Raylake, and Rosenwall Addressing this issue should begin with scoping and project development on the district level to review shortcomings related to these soils and explore alternative forest structure and silviculture designed to reduce SPB problems Solutions could include increasing hardwood components, uneven-aged management, loblolly reduction, and reestablishment of hardwood-pine savannas Portions of Diboll soils, near Shawnee Prairie, Angelina County, and on the Davy Crockett NF may have been in a near treeless condition (0-12/acre) at one time Management of Diboll soils should be reevaluated also Similar investigations should occur on the Sam Houston NF where SPB has been severe in the past

Response: Interpretative soils data was used to determine the vegetative types for stands within MAs ECS is being developed for use on the NFGT The use of the ECS may require some reevaluation of certain vegetative types for various soil conditions Matching the appropriate vegetative type with the site should increase vigor and potentially reduce SPB impacts

Letter: 1763 we encourage the FS to work with the US Fish and Wildlife Service to broaden its objectives to instead manage for dwindling long leaf pine little bluestem upland forests The proposed increase in use of prescribed fire, and the shift to planning summer season burns are effective measures to restore and maintain these habitats,

Response The IDT appreciates your support

Letter. 1632 Whole stand regeneration is not necessary or desirable

Response. The revised Plan is a programmatic document, and as such, does not make site-specific decisions Harvest methods are based on a site-specific analysis and designed to meet the DFC of the stand(s) The choice of harvest method on a site will be documented in accordance with NEPA and be available for public review prior to implementation

Letter· 861 I think we can afford to leave some forested area a full mix of native trees

Letter· 1632 Hardwood quotas in pine stands must be in place, not just "allowable" Hardwood numbers should increase by forest types from longleaf to shortleaf to loblolly

Response: The revised plan allows for the appropriate mix of pine and hardwoods based on a site-specific analysis using the ECS

Letter· 1632 Targets for seedling density are too high Such high densities preclude development of significant wildlife foods and herbaceous plant communities High densities are resulting in increasing SPB losses in pre-commercial plantations Along with increased reliance on natural vegetation I support lower stocking levels of pine to allow for a more diverse vegetational mix Lowering seedling targets saves money by foregoing mechanical site preparation designed to achieve high seedling density

Response: The seedling stocking guides are just that - guides The upper limit is the point at which a stand should be evaluated for pre-commercial thinning Natural mortality is usually considered sufficient to maintain the stands health prior to that point A 3-year average survival check for all species indicated a less than 70% survival rate

Letter· 1632 The Ecological Classification System in App A of the Plan does a commendable job of describing the diverse habitats occurring across the forest But it is contradictory that RCW management seeks to maintain nearly identical forest conditions across a range of highly different natural habitats It is most evident in MA-2 that EM is in fact management designed to meet the perceived needs of the RCW rather than a holistic approach to ecosystem health The FS needs to make commitments in the plan to maintaining greater habitat diversity than the Draft would allow for and quantify how that will be done

Letter· 1723 (pg 44 DEIS) while extolling the virtues of EM and ECS you are not taking into account that other forms of management will overrule these For instance RCW management will ensure that forests that were usually mixed with hardwoods and pine in the SHNF will mostly be pine because you have the entire forest as a HMA

Issue 1-7 Ecosystem Mgmt

Response. The RCW EIS is developed to provide guidance in pine or pine-hardwood sites This FP describes more specifically land type associations (LTA's) within the USFS ECS that provide these pine dominated habitats LTA's and stands that have a hardwood dominated ecological component will not be included within the pine and pine-hardwood prescriptions for the HMA's Likewise, special areas such as Big Creek Scenic Area, have not been included or calculated into the pine and pine-hardwood habitats for RCW management These specific sites, though completely surrounded by upland pine dominated HMA landscapes, will be managed for the specific character and emphasis described in the RFP for the NFGT The mix of hardwoods in pine stands is based on optimum conditions for RCW and species that prefer similar habitat It is not designed to provide optimum or maximum mast for species that require this habitat Though hardwood control will be an accepted practice, sites with a natural hardwood component will be managed to retain that character If the site is ecologically defined as a hardwood dominated site through the ECS, then it will be managed as such and not as part of the RCW HMA pine dominated uplands Ecological conditions specifically for TX have been described in detail within App A of the DFP and App H of the DEIS for the FP

Letter: 1310 The first priority of biodiversity planning and management must be protecting and enhancing habitat for endangered, threatened, or sensitive species But the proposed management for the RCW is too much single-species management

Response There will be few impacts on wildlife species such as deer, quail and wild turkey Some species of hardwood trees and shrubs may be eliminated or greatly reduced through prescribed burning and other midstory control measures This would be expected to result in a decrease in availability of mast on which some wildlife species are dependent However, some mast producing species will be enhanced with an open midstory Overstory mast producers, if present, would probably not be affected Because of the limited mast production capabilities of some midstory species and the fact that overstory mast producers will probably not be affected, the overall effect on mast dependent species is very likely going to be minimal In contrast, a majority of herbaceous native plants, animal and other species which occupy similar habitat to that of the RCW depend on the same fire dependent ecosystem as the RCW Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable

Letter: 1263 Please help retain stands of long-leaf pine

Response The revised plan will increase areas of longleaf pine

Letter 1608 Related to biodiversity, it seems that for years the National FS has said that they have been managing for it And yet, only approximately 32,000 acres of Texas forest land is longleaf pine Also, current management practices leave little or no hardwoods in place in timber producing areas It is time we made a real effort to manage for biodiversity

Response· The IDT is unclear whether this reference to biodiversity refers to restoration of longleaf or the retention of hardwoods The DFC for any site is based on a site-specific analysis and will be documented in accordance with NEPA

Letter· 1632 Mesic forest management should be expanded by a least 10,000 acres forest wide

Response· Refinement of all LTA's will be ongoing as analysis' are completed and technology is improved

Letter: 1632 For pine types, perform restorations that will only require selective thinning and/or prescribed fire Short-term, low-impact successes will go further in convincing the public that EM is truly a change in management direction and is achievable

Response: This has been implemented for some time now Thinnings may take several entries to complete the conversion to longleaf

Letter: 1632 High quality native forests and associated diverse plant communities are being replaced by essentially single-species plantations that bear little resemblance to the native communities they replace, resulting in the loss of biodiversity resources mandated in N F M A.

Response: The ECS will be used during site-specific analysis to determine the appropriate species or mix of species on a specific site

Issue: 1-7 Ecosystem Mgmt

Letter: 1310 The natural, native forests of the Gulf Coastal Plain were mostly mixed stands of pine/hardwood and hardwood/pine of mixed ages, as proven by numerous studies, and true ecosystem management must rehabilitate our public forests to that condition

Letter: 1723 (pg 4 DEIS) the ECS is unfinished and the public has not had an opportunity to input on its development. the public will not be able to comment on a finished ECS so the entire scope of this heart of ecosystem management will not be known and then available for public to review and comment This must not be allowed to occur A separate, completed ECS needs to be produced and released for public comment so that the entire scope of this procedure has full public participation and input

Response. ECS is a continually developing & improvement effort as more information is gained, clearer identification of ECS components will be described Numerous state, federal, and university personnel, as well as organizations and individuals have provided information Your input is also welcome

Letter 1632 FS rationale for use of even-aged systems with loblolly and shortleaf hinge upon use of prescribed fire for midstory control and the purported lack of regeneration in these types under frequent fire Logic would tell us that in nature either these types did in fact regenerate under frequent fire conditions or that the hardwood component was more widespread due to less frequent occurrence of fire In loblolly types, hardwoods are a natural and desirable component Fire frequency in these areas should be less than in other pine types

Response. Effects of fire on southern pine species is well documented The Plan & EIS incorporate this information, which is consistent with the Vegetation & RCW FEIS

Letter: 1679 The Draft FP does not take steps to preserve bio-diversity Management indicator species are biased to favor even-age management The form used for measuring diversity favors even-age management There was not an adequate inventory of forest resources. The classification system used favors commercial timber The effect of the DFP is type conversion

Response The MIS list has been changed to reflect concerns identified during the 90 day review period

Letter: 1723 (pg 6 summary) please define "an ecological approach to management" What does this mean?

Response: Mgmt that incorporates ecological factors, both biotic & abiotic

Letter 1723 (pg 233 DEIS) under Ecosystem Management, what are "forest ecological units" Please define this In addition this definition of EM is not the one I have seen come from the Chief's office Why is it different?

Response Ecological units are defined in the ECS, Plan App A The direction, focus & definition of EM is based on combination factors & definitions, this is the definition NFGT intends to use during Plan implementation

Letter 1723 (pg 43 DEIS) management for all, not just some ecosystems, which are unique or declining in NFs must be done you talk about diverse ecosystems but why do you not say "naturally diverse?"

Response The ecological systems we intend to maintain are described in the ECS No doubt other systems have been proposed outside the ECS - we cannot ensure all variations for all people

Letter: 1723 (pg 71 DEIS) I am against using mechanical control on grasslands unless the situation is very unusual . why are you proposing that which will alter the natural ecosystem of the area?

Response
Restorations of severly eroded gullys require mechanical treatments

Letter: 1723 (MA-4-12) what does maintain existing plant communities mean? FS will use this as an excuse to cut trees in the corridors

Issue: 1-7 Ecosystem Mgmt

Response. The term maintenance is used to incorporate continuing M&E evaluation strategies, then subsequent active mgmt to reach & maintain the DFC

Letter· 1723 (MA-2) Raven Hills LTA other species that must be managed for are hickory and for Big Thicket and San Jacinto Flatwoods you need to add the Southern Mixed Hardwoods

Response· Modifications to LTA descriptions have been made, the ECS is a developing process with site specific sampling scheduled for the Sam Houston in 1996

Letter: 1723 MA-2-02 - how many acres in the San Jacinto Wildlife Demonstration Area will be in longleaf pine? Is the pine really natural to this area?

Response: San Janinto WDA has been removed from MA-2 direction-Longleaf Pine potential on the SHNF will be evaluated on a site-specific basis

Letter: 1723 (pg 77, DEIS) it makes no sense to say Alt 3-5 will have the best lichen, moss, and liverwort groupings when due to shorter rotations and use of fire these species will be negatively impacted

Response: Species thrive in a variety of habitats, including xeric, fire maintained systems The general assessment on pg 77 of the DEIS was based on best available information

Issue 1-7-1 Grasslands

Letter: 1605 MA-3-04 - Existing woody vegetation within streamside zone ecosystems should be retained only if consistent with establishing/maintianing native vegetation Non-native woody vegetation should be phased out, to the extent that this can be done without disturbance to neighboring native vegetation

Response MA-4 has been changed to better clarify SMZ DFC & mgmt

Letter· 1605 MA-5-11 - Existing woody vegetation within SMZ ecosystems should be retained only if consistent with establishing/maintaining native vegetation Non-native woody vegetation should be phased out, to the extent that this can be done without disturbance to neighboring native vegetation

Response: MA-4 has been changed to reflect your concerns in SMZ's Lakeshore zones, however are more visually sensitive & retention of trees is a primary concern

Issue· 2 VEGETATION MANIPULATION

Issue 2-1 Harvest Methods/Silvicultural Systems

Letter: 199 We must think of our forests as part of a bigger picture Gone are the days when timber harvest was almost the whole thing The "good old days" seem to be gone forever

Letter: 456 Logging methods need to be improved

Letter: 530 "Checkerboard" clearcutting as now practiced by the Ministry of Natural Resources in Ontario (Canada) may be an acceptable practice, provided the squares are relatively small (120 hectares in northern Ontario) They used to clearcut much larger areas-I have seen those of 4-5 square kilometers in size - but changed to smaller size clear cuts. Small checkerboards eliminate the need for planting

Issue: 2-1 Harvest Methods/Silvicultural Systems

Letter: 1632 There is no need to use stand regeneration of a disturbance regime since gap fall and wind disturbance are still fully functioning natural processes Timber harvests are differentiated from natural disturbance in that the former causes severe soil impacts and loss of biodiversity not associated with the latter

Letter: 1632 I oppose the use of even-aged and two-aged cutting systems to convert native forests into plantations
Letter 1636 A general comment is that minimizing the damage during harvesting is desirable under all methods and I recommend severe penalties for damage
Letter: 1723 (EIS appendix J pg 5) I am against your definition of group selection which goes up to 2 acres in size
Letter: 1723 (EIS appendix J pg 10) shelterwood is not the only cutting method suitable for LL Pine Group selection can also be done
Letter· 1723 (pg 19, DEIS Summary) I am opposed to all forms of even age management
Letter: 1765 A minimum only of new essential logging trails should be permitted

Response Comment noted

Letter: 1310 It has often been pointed out that while the national forests represent only 5% of the forestlands of East Texas they have 20% of the standing sawtimber volume Those who are obsessed with timber production have tried to use this as an argument for high rates of timber cutting on the national forests But this statistic simply points up the fact that the large commercial timber companies are cutting at an unsustainable rate Sure, if all the neighbors cut down all their trees, then my yard will have not 20 but 100 percent of the standing trees in the neighborhood Does that mean that I should now let them cut down my trees too?

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter. 1438 I would like to see silvicultural prescriptions such as the irregular shelterwood implemented in areas where aesthetics are a primary concern

Response· Silvicultural prescriptions are based on a site-specific analysis to meet the DFC Irregular shelterwood harvests are one of the methods available Harvest decisions are based on many factors such as age and condition of the trees, wildlife needs and aesthetics

Letter· 1394 I think you need to look no further than your own "controlled" logging activities to see where the damage to wildlife and erosion are resulting from
Letter: 1461 the incredible extensive abuse, damage and destruction from logging in all forest land
Letter: 1772 I think you should be more concerned on how much damage logging is doing (than ATV's) Logging destroys the forest and it takes years to recover
Letter· 1773 loggers are permitted to go into the forest anywhere they please and literally destroy everything in sight To me, the actions of the loggers are doing more harm to the forest than my small ATV

Response S&G for timber harvest activities and ORV management are in place that would ensure resource protection and/or mitigation Only in cases where these S&G have not been properly implemented, would unacceptable resource damage occur

Letter 1678 I would ask you to reconsider the planned use of clearcutting and other even aged forest management practices Use instead selective cutting of all species of trees Selected not just with the concerns of efficient timber production in mind, but also the diversity of age and habitat

Response· Recent direction has limited the amount of clearcutting being done on the NF The circumstances under which it can be used are described in the Forest-wide S&G Clearcutting like all harvest methods may sometimes be the best way to achieve the stand's DFC

Letter 1310 Allowing skidders inside SMZ's at the discretion of the timber sales administrator is not justifiable
Letter: 1605 Allowing skidders inside SMZ's at the discretion of the timber sales administrator is not justifiable

Issue: 2-1 Harvest Methods/Silvicultural Systems

Response: There are situations that require limited access of mechanical equipment within the SMZ S&G limit the use of such equipment use The Sale Administrator ensures these S&G are adhered to during sale activities

Letter. 1310 Allowing timber cutting for "other than timber production objectives" is nothing but a dishonest ploy to claim that the SMZ is not managed for timber

Letter: 1605 *Allowing timber cutting for "other than timber production objectives" is nothing but a dishonest ploy to claim that the SMZ is not managed for timber,*

Response: SMZs are identified as MA-4 in the revised FP MA-4 is classified as unsuitable for timber production and no harvest volume is calculated from the area Timber harvest may be used as a tool to improve the DFCs of SMZs as determined during a site-specific analysis

Letter. 1632 I am alarmed by the numerous clauses allowing stands to be thinned or clearcut based on silvicultural prescriptions such as stocking levels, density, and in the case of pine, SPB threats SPB and red heart are inherent threats to pine types and mandating the clearcutting of pines " to protect the stand from destruction from insects or disease", as on page 7, App I, EIS , insures that no OG pine stands will exist

Response: Many pine stands, such as those in wilderness and some special areas will not be harvested but allowed to grow until they die

Letter: 1632 The exclusive use of even-aged cutting techniques has resulted in plantations that are aesthetically inferior to native forests and offer a reduced spectrum of recreational opportunities

Response: Aesthetics and recreational opportunities are analyzed and documented in accordance with NEPA in project level decisions

Letter: 1632 timber harvest policy and guidelines have resulted in uniform and significant degrade of NF multiple resources

Response: The IDT is not aware of any studies that document this

Letter: 1640 The decision on what silviculture method will be used where for alt 4B needs to be specified now, along with the effect on fish and wildlife amount and quality of habitat in the chosen areas

Response: This EIS is a programmatic document that sets general direction A silvicultural prescription based on a site-specific analysis is designed to meet the stand's DFC The analysis is documented in accordance with NEPA and is available for review by the public

Letter: 1646 I am sure you too are shocked and disillusioned at the remains of a logging site where everything in it's path is knocked down and trampled

Response. Harvest methods are based on a site-specific analysis designed to meet the site's DFC The environmental impacts are documented in accordance with NEPA Contract terms and conditions are used to implement the necessary S&G to prevent unacceptable damage

Letter 1651 I believe other silvicultural prescriptions should be considered in HMA's (such as shelterwood) to maintain a healthy forest and provide a increased ASQ

Response: The RCW EIS allows a full range of harvest methods with some restrictions designed to meet the DFC of improving RCW habitat

Issue: 2-1 Harvest Methods/Silvicultural Systems

Letter: 1671 identifies 3 silvicultural systems for managing forest, the even-aged, two-aged, and uneven-aged systems & their associated regeneration methods Bach has been shown to have benefits as well as limitations relative to particular goals This Dept supports using whatever available silvicultural methods best achieve the identified management goals for each of the 11 major land allocations The FS is obligated to address resource management issues that will require management considerations ranging from broadly based ecosystem & plant community management to site specific treatment of specific stands & species These management needs will require the potential use of all available tools The degree of acceptability or usefulness of each of the three methods will be determined on the precise delineation of the management goal and related objectives

Response The IDT appreciates your support

Letter: 1671 Uneven-aged management has caught much attention making it work in the presence of fire and hardwoods will require untried modifications to the system There is concern that the public, wildlife biologists, and the USFS will not be satisfied with the results of such an attempt Another limitation with uneven-aged management is the extreme difficulty of conducting prescribed burning while producing or maintaining regeneration It will be very difficult, if not impossible to burn effectively & still achieve adequate regeneration under an uneven aged management regime This should be taken into account when prescribing regeneration cuts to management units Perhaps irregular shelterwood would better achieve desired regeneration while maintaining the ecosystem in the most natural manner

Response: The IDT agrees and recognizes flexibility and creativity will be needed in preparing silvicultural prescriptions

Letter 1679 Even age management will destroy the forest, and turn it into a pulp farm When brush starts to grow back it is out in the open, and absorbs too much sunlight When the pine trees start to grow, they are out in the open and limbs reach out in every direction There is no need for even-age management If you manage the forest like a garden Trees that grow in a clearing grow tall and straight reaching for the sun

Response: Even-aged management has been successfully used in southern pines since the forests were first cut by settlers All harvest methods are available in the revised Plan and will be based on a site-specific analysis designed to meet the site's DFC

Letter 1679 Natural regeneration is not addressed as a type of site prep

Response: Natural regeneration is used with various harvest methods such as seed-tree, shelterwood, two-aged methods, and single-tree selection Site preparation may be necessary to prepare the seed bed prior to seed fall The choice of site preparation is made on a site-specific basis and documented in the project level environmental document

Letter 1679 Using even-age irretrievably commits forest to unproven even-age management forever

Response If this is true, then NFGT became committed to even-age management when the acquired cut-over lands were planted by the CCC in the 1930's If a site-specific analysis determines uneven-aged methods are the best way to meet the DFC, a silvicultural prescription will be prepared to implement the necessary actions

Letter 1679 Committing so much of the forest to pulp wood means the FS is betting everything that pulp wood will sell in the future America is moving more to laser printer and copier machine quality paper, a better quality paper Junk even age wood is not good enough for this quality paper Kenaf has been discovered which will grow fiber quicker, does not require chlorine to remove the tannin, and will grow in dry areas without irrigation Home builders are starting to use metal for framing, and manufactured wood is becoming practical Where is the FS crystal ball? Can even-age junk wood be sold in 70 yrs ?

Response: The harvest of pulp is an intermediate cut and not the final product Pulpwood is a by-product of a stand treatment such as commercial thinning

Letter 1679 The Draft FP does not specifically point out why seedtree and shelterwood cuts are the preferred alternative on a non-economic basis

Response The revised Plan is a guide to implement the selected alternative The EIS evaluates the environmental effects of the alternatives The choice of a harvest method is based on a site-specific analysis and documented in the project-level environmental documents

Issue 2-1 Harvest Methods/Silvicultural Systems

Letter: 277 the plan continues to emphasis an unproven variation of even-aged logging Using single-tree selection management without herbicides would be an acceptable alternative I have always wished you would manage these forest as if you owned them Can you name any privately owned forest that is even-aged managed?

Letter: 1679 The Draft FP uses too much management Trees will grow naturally without the need of extensive site preparation Single tree selection with natural regeneration is the most effective use of forest resources

Response The Plan provides that both even-aged and uneven-aged management systems will be used The decision of which system will be used on any particular site will be made on a site-specific basis The use of the single-tree selection system without the use of herbicides has not been well researched and could only be used on a demonstration or experimental basis Even-aged management systems have been thoroughly researched and have been in use for decades by numerous public and private forest landowners

Letter. 1438 I would also like to see the number of clearcut acres increased from alt IV B

Letter: 1453 I urge an end to all even-aged management on NFs, including clearcutting, patch cutting, salvage logging, seedtree, shelterwood, or other techniques that lead to even-aged

Response. Recent direction from the Chief limited clearcutting on NFS lands to areas where it is essential to meet FP objectives and where particular circumstances require it The selected alternative incorporates this direction while providing that regeneration cutting methods be determined on a site-specific basis

Letter. 1453 proposed lumbering methods including use of even-aged logging in its various forms (clearcutting, shelterwood, seed-tree cutting), large group selection and salvage cutting, damage the habitat, endanger wildlife (such as the RCW), expose local communities to a highly capitalized, low labor, cyclical economy

Response· The environmental effects of timber harvesting systems have been thoroughly researched The effects on wildlife habitat vary with the harvesting system used and the species being evaluated Generally speaking, species that fare well under even-aged systems won't fare as well under uneven-aged systems and vice versa The preferred alternative provides that various uneven-aged and even-aged systems be used, which will provide suitable habitat for a wide range of wildlife species The effects of various timber harvest levels on local economies has been analyzed and only quantities that are sustainable over the long term are allowed in any of the alternatives

Letter 1579 No trees should be cut unless it is on a tree farm and some of them too should be left to grow and replace some of the forest which had been cut before them

Response. Harvesting trees is a forest management tool that can achieve multiple objectives, particularly in providing various types of wildlife habitat The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness, and determine for management systems, harvesting levels, and procedures " Not providing for some level of sustained timber harvesting would put us in violation of the law

Letter: 1679 The Draft FP references the Vegetation Management Plan The vegetation and timber must be analyzed together The EIS is nonsense without a combined analysis of the vegetation manipulation in concert with the timber cut

Response: The FEIS for Vegetation Management in the Coastal Plain/Piedmont analyze the effects on vegetation including trees

Letter: 1679 The Draft FP downplays the effects of erosion and sedimentation resulting from even-age cuts There is no research or documentation backing up the effects of even-age cuts

Response: The effects of erosion and sedimentation for each alternative is addressed in the EIS

Issue: 2-1 Harvest Methods/Silvicultural Systems

Letter 1723 (pg 61) define numerically what shelterwood with reserves means when you say "when retention of SOME overstory trees is desirable" If the reserve numbers are the same as on pg 62 then the number of leave trees is too small You never say what percent of the trees left are likely to blowdown You need to reveal this environmental impact

Response: The table on page 62 shows the number of trees by diameter to achieve different BA objectives The number of reserve trees will be determined by a site-specific analysis and designed to meet the DFC

Letter: 1749 even-aged logging must stop before there isn't an animal alive in our forests but deer - or is that the plan?

Response: The FS manages for viable populations of wildlife that occur naturally on NFGT The environmental impacts on wildlife of the different alternatives are analyzed in the EIS

Letter: 1604 the DEIS and Draft Plan call for further even-aged practices which would degrade the statutorily listed resources, (soil, watersheds, fisheries, wildlife, aesthetics, forest productivity) and each of them

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " in accordance with FLPMA Section 103 (c)

Letter: 1409 Uneven-aged management system or selection cutting is preferred over clearcutting Loosing understory species lets in daylight to the forest floor and undesirable plants (briars) grow that are unmanageable If this does happen the FS needs to cut them regularly with a brushhog till the situation is under control Uneven-aged cutting does have the least impact on the forest

Response: Silvicultural prescriptions are based on a site-specific analysis and designed to meet the DFC Single-tree selection is one of the many methods available Harvest decisions are based on many factors such as age and condition of the trees, wildlife needs, soils and aesthetics

Letter: 1648 Management must recognize that a pine tree in one location cannot necessarily be successfully replaced by one from 30 miles away Artificial regeneration has already caused a tremendous loss of local genetic diversity Any harvesting should be done only AFTER natural regeneration has progressed to a level sufficient to replace the harvested trees

Response· The parent trees of genetically improved seedlings are Texas trees Sufficient parent trees are available to provide a diverse genetic base

Letter 1723 *MA-2-123 - two-aged regeneration is totally unproven for the pines that you are trying to grow I oppose any special site preparation except for a* low intensity burn

Response This is detailed in the RCW EIS which this document incorporates

Letter: 1604 The DEIS at 86, asserts that more clearcutting would be necessary under Alt 6 than Alt 4b Actually, none would be necessary under either Alternative Selection management is adaptable to restore native pine stands after catastrophic and even after planting to the non-native slash pine in Texas Declaration of Thomas Hayes, attached

Response: This table reflects Forplan outputs Alt 6 was modeled with 10% EAM & the Forplan model chose to take the majority of EAM during the first period

Letter 1723 (pg 255 DEIS) Sanitation Cut subjective and can be used to justify cutting when the trees are healthy and will not be attacked (like SPB cutting for instance)

Response Sanitation Cutting as used on NFT is defined by the Society of American Foresters and is explained in the glossary for the EIS

Letter: 1679 What are the long term effects of extensive even-age management as proposed in this Draft FP Where is your research and documentation?

Issue. 2-1 Harvest Methods/Silvicultural Systems

Response: These effects are documented in numerous research papers and publication, and textbooks which are available at libraries and universities

Letter: 1723 (EIS appendix J pg 2) clearcutting with reserves This method of cutting is not sound because the reserves left are not large enough
Letter: 1723 (EIS appendix J pg 2) you need to acknowledge that seedtree and shelterwood cuts are essentially two or three stage clearcuts
Letter: 1723 (EIS appendix J pg 3). seedtrees are removed at a later time then you cannot truthfully say that they are reserves
Letter: 1723 (EIS appendix J pg 3) you need to call a two age system what it is, a clearcut
Letter· 1723 (EIS appendix J) shelterwood with reserves is a largely untested method Talk about your grand experiements and taking risks with endangered species

Response: This revision uses the accepted SAF terminology for even-aged regeneration methods as shown in the glossary for the EIS

Letter 1723 (EIS appendix J pg 9) that clearcutting is most suitable for cutting intolerant species but you do not acknowledge such cutting causes soil erosion, fungi loss, salamader loss, and does not mimic nature Nature does not take all trees away Even in a blowdown those trees remain on the site discussion of how you should use clearcutting does not jibe with App H & I which indicate that in most cases TX had uneven age stands of trees before white settlers started cutting

Response: This section only describes, as the sub-title indicates, species requirements

Letter: 1723 (pg 242 DEIS) if you define this via commercial timber production then you already are biasing actions toward timber production rather than having all the uses be equal and none dominant

Response Definitions in the glossary were obtained from the source documents listed on page 224 of the DEIS This terminology was used by the IDT in preparing the revised plan and EIS

Letter· 1723 (pg 64, DEIS) you do not specify what percent of the residual stand is damaged by logging, what types of damage occur, what the survival rate for trees damaged is

Response Damage resulting from a harvest operation varies by type of harvest operation, size, & density of trees removed and left, equipment used, experience of operator, etc

Letter 1310 The DEIS completely fails to analyze the effects of different silvicultural systems on soil chemistry and micro-fauna

Response: The study by TX A&M University on the Angelina NF found that clear-cutting does not have long term adverse impact on soil chemistry This was determined by water quality analysis

Letter: 1723 MA-4-114 - this is a loophole so the FS can have an excuse for logging What is the definition of "extreme catastrophic occurrence" and "enhance the natural integrity of the streamside zone"?

Response. Extreme catastrophe may include hurricane, tornado, or fire that do major damage to the integrity of the primary zone, which provides protection for soil & water integrity

Issue: 2-1-1 Clearcutting - Yes

Letter: 614 clearcutting and salvaging of the timber on Federal land is appropriate stewardship of these properties
Letter: 1733 This forest management tool is vital in the scheme of forest land management and biodiversity and I feel that such treatment areas can and are restricted to 80-100 acres or less and the FS should be allowed to prescribe such when necessary (longleaf regeneration and some bottom land hardwood regeneration)

Issue: 2-1-1 Clearcutting - Yes

Response: The IDT appreciates your support

Letter· 1510 The clearcutting maximum of 722 acres per year is an unrealistically low number The amount of clearcutting should be adjusted according to the silvicultural needs of the forest Southern pines are an even aged species which requires clearcutting to properly regenerate Without clearcutting, the forest will slowly be replaced with more tolerant species such as the oaks and hickory Pine were predominant before the white man came to Texas because of two things Fire removed most of the hardwoods except in sheltered areas such as river bottoms and wet areas Secondly, mother nature occasionally started over by a near total removal of a forest by a catastrophic event such as a SPB outbreak. We can mimic nature and have a product we can use at the same time

Response The IDT agrees with your assessment In response to changing values current policy limits the use of clearcutting on NF to situations described in Silvicultural Practices Standards Silvicultural prescriptions are based on a site-specific analysis and designed to meet the DFC of the site The effects on the biological, physical and socio-economic environments must be evaluated and documented in accordance with NEPA The deciding official then selects the alternative that best responds to issues that have been identified for the project

Letter 1605 The DEIS notes that extensive areas of early successional forest pre-dispose neo-tropical species, which are in decline, to avian parasites Yet this is exactly the type of habitat produced by clearcutting, shelterwood and seed-tree cutting,

Response: Not all species require identical habitat conditions The revised Plan provides for a variety of habitat conditions

Issue: 2-1-2 Clearcutting - No

Letter: 1723 (pg 16 DEIS) I also oppose site preparation and clearcutting and cutting in streamside zones for SPB and cutting in scenic areas and mineral drilling in scenic areas
Letter: 1723 MA-2-119 - I am opposed to any clearcutting
Letter: 1723 (pg 60-62, DEIS) I do not approve of clearcutting in LLP and Shortleaf Pine areas
Letter: 1723 (FW-163, 164) I am against clearcutting and all other forms of even age mangement Your clearcutting limitations are so broad that any piece of the NF can be justified for clearcutting using the exceptions

Response Comment noted

Letter: 4 I am writing in regards to the prevention of certain timber cutting methods including clearcutting
Letter: 8 I am totally against clearcutting
Letter. 9 I am opposed to "clearcutting" and any other harvesting methods whose results resemble "clearcutting" It is time the FS reconsidered its policies on its timber cutting methods
Letter 19 Clearcutting is destructive, not only of natural forests (They do not recover)
Letter 38 Clearcutting is nothing more than rape It should be stopped
Letter· 81 Even-age logging is too destructive
Letter: 332 I am 100% against any form of clearcutting
Letter: 368 I have concerns about Plan 4b It allows the destructive system of even-age logging to continue
Letter: 454 Clearcutting area is hardly what I call safe, scenic or enjoyable
Letter: 492 the aims and desires of the citizens have been buried under the odd notion that clearcutting are what the majority of Texans want
Letter: 620 Clearcutting causes floods & destroys the land
Letter 854 I am appalled that our NFs would still allow clearcutting

Issue· 2-1-2 Clearcutting - No

Letter: 957 The devastating effect of clearcutting forests was obvious - even where effort made to conceal
Letter: 993 I would like to see clearcutting eliminated from NF property
Letter: 1252 No clearcutting of our forests is allowable
Letter: 1433 Clearcutting must stop
Letter: 1455 So much is lost with clearcutting
Letter: 1474 I would like to see clearcutting totally eliminated in mixed forests It has no business being used in publicly owned forest
Letter 1484 Clearcutting and all of its variants do not represent multiple use of our national forests but rather single use to the detriment of all except those involved in logging
Letter 1568 Demand that destructive methods of logging, such as clearcutting, be halted
Letter· 1595 I would prefer that you cease all forms of clearcutting at once and forever
Letter. 1596 reconsider your use of clearcutting (and other "even-age" prescriptions) as part of your mgmt plan
Letter. 1609 Please reduce clearcutting to a minimum The forest products companies are turning East Texas into one giant tree farm The national forest should be for the people, not large corporations
Letter 1615 I am OPPOSED to even-aged management in our National Forests This type of forest management is as bad as clearcutting inasmuch as it destroys our hardwoods, and, what you wind up with are Pine tree farms
Letter 1625 I feel that clearcutting must be eliminated
Letter 1665 I would like for the clearcutting to stop in Texas NF
Letter· 1674 I am supporting a reduction in clearcutting in the Texas NF System

Response: Recent direction has limited the amount of clearcutting being done on the NF The circumstances under which it can be used are described in the Forest-wide S&G Clearcutting like all harvest methods may sometimes be the best way to achieve the stand's DFC

Letter 1315 I perform volunteer work on the Lone Star Trail and am getting tired of trying to keep blackberries off the trail through clear cuts Please - no more clear cuts

Response: The final plan provides for a trail corridor up to 150' on both sides of the trail The trail corridor will generally be managed for retention or *partial retention of tall forest cover Prescribed burning will be applied in selected areas and not in others This will vary according to T&E* species management, necessary on and along the trails Trail maintenance and marking will continue as it has in the past

Letter 1679 Even-age cut diminish the recreational values of the forest The forest is less multiuse, instead it is commodity oriented Even age cuts impact birdwatching, tourism, backpacking, wildlife sightings, and the beauty of the forest.

Response: Aesthetics and recreational opportunities are analyzed and documented in accordance with NEPA in project level decisions

Letter 654 Clearcutting sacrifices the whole area,
Letter 723 There is no place for clearcutting in OUR national Forests This destroys animal habitats and causes serious soil erosion
Letter. 1041 I am opposed to clearcutting, in any form, one reason is the increased "edge effect" which puts increased pressure on declining, forest nesting birds
Letter: 1235 When clearcutting takes place, it seems that the NF wind up being "pine plantations".
Letter: 1400 People enjoy and value the forest for its beauty and tranquility Clear cuts are anything but beautiful
Letter: 1450 I am totally against clearcutting as destructive to the soils and streams, as well as wildlife
Letter: 1465 (Alt 4B) perpetuates the "stump farm" mentality of even-age management, under its various pseudonyms
Letter: 1577 I would like to voice a protest against clearcutting or even-aged management Not only is clearcutting ugly to look at, it is environmentally unsound
Letter: 1580 "Even aged management" permits widespread clearcutting to which I am very much opposed ruins the wildlife habitats and turns large areas into wasteland for a long time
Letter: 1598 Strip cutting and replanting plots of even-aged trees must be stopped The National Forests should not be used for tree farms Strip cutting and reforestation has destroyed our hunting, bird watching and general enjoyment of our forests

Issue: 2-1-2 Clearcutting - No

Letter: 1626 prohibit any further clearcutting in the NF in Texas There are other methods of harvesting trees that are just as profitable without the destruction to our environment I have made numerous trips to the Pacific Northwest in the past decade and have seen the devastation caused by clearcutting I do not want East Texas to look like the Olympic Peninsula If private companies want to raise trees on their own land and clearcut them, that is fine But I think the NF in Texas should be protected for the enjoyment of all.

Letter: 1633 I was disappointed by the Plan's continued insistence on the use of clearcutting and its variants (seed tree and shelterwood) for timber production.

Letter: 1661 Clearcutting destroys too may animals and their habitats.

Letter: 1708 Clearcutting required too many years for nature to come anywhere close to a balanced climax biome

Letter: 1776 I spend many hours working on the Lone Star Trail and clearcutting significantly increases our work and destroys the beauty of the area that has been cut There is a dollar cost to this unsightliness, it is difficult to measure but it is there

Response. Recent direction from the Chief limited clearcutting on NFS lands to areas where it is essential to meet FP objectives and where particular circumstances require it The selected alternative incorporates this direction while providing that regeneration cutting methods be determined on a site-specific basis

Letter: 1723 (pg 241 DEIS) clearcutting does not "maintain or upgrade man's psychological welfare" so it would seem to be the antithesis of Landscape Management

Response. The IDT agrees with your assessment In response to changing values current policy limits the use of clearcutting on NF to situations described in Silvicultural Practices Standards Silvicultural prescriptions are based on a site-specific analysis and designed to meet the DFC of the site The effects on the biological, physical and socio-economic environments must be evaluated and documented in accordance with NEPA The deciding official then selects the alternative that best responds to issues that have been identified for the project

Letter: 375 Even modified clearcutting fragments our forest areas inviting cowbirds to lay their eggs in the nests of our native birds Clearcutting also strips the forest of canopies that make safer habitats for our birds

Response. Not all species require identical habitat conditions The revised Plan provides for a variety of habitat conditions

Letter: 724 The FS already acknowledges that large areas of unfragmented mature forests are required for several species of birds and animals to survive Please stop further forest clearings and even aged logging If this continues, in a few years I can look forward to taking my daughter to forests that are totally devoid of any bird or animal life

Response: The FS manages for viable populations of wildlife that occur naturally on NFGT The environmental impacts on wildlife of the different alternatives are analyzed in the EIS

Letter. 279 I mourn the day multiple use was derailed and overcutting - especially clear cutting - was started This was a breach of trust which the public would NEVER have accepted had they been given an accurate description of what was going on It's time to reverse directions and return to a stewardship ethic

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " in accordance with FLPMA Section 103 (c)

Letter: 1723 (pg 60-62, DEIS) You never define how you determine what optimum regeneration means

Response

Under the requirements of NFMA, site-specific analysis and disclosure is needed to support any decision on clearcutting as being "optimum" or other even-aged regeneration methods as being "appropriate" Many of the alternatives limit the use of certain even-aged or uneven-aged regeneration methods where the use of such methods would not achieve the objectives of the management areas within those alternatives

Issue: 2-1-2 Clearcutting - No

Letter: 1607 It saddens me to drive down the road and see a beautiful row of pines along the highway and when you look deep, that is all that is there is that small row and nothing behind them I would like to see clearcutting reduced significantly.

Response. The NFT does not leave a screen by roads. With the revised FP, we will manage land adjacent to roadways according to the VQO guidelines in the FW S&G's

Issue: 2-1-3 Uneven-Aged Mgmt

Letter: 1310 Mr Burns has managed the Dean Estate lands under selection management since 1976, without the use of herbicides The forest there is both productive for timber and wildlife, with a good variety of hardwoods mixed with the pines According to Mr Burns, "For the integrity of the site, selection management is much better I have seen some horrible examples of erosion from clearcutting You can lower site quality by 10 feet tree height in 50 years."

Letter 1632 Natural disturbance factors more likely mimicked uneven-aged systems where individual and small clump openings are the norm Under EM there is no need to regenerate entire stands in an effort to mimic processes that are still active on a landscape level.

Letter: 1723 according to the FS expert on uneven age management, James Baker, uneven age management does not have more miles of roads than even age management

Letter: 1723 (pg 63 DEIS) you state that you have a hard time burning uneven-aged pines and therefore you need to use herbicides It is okay that some of the pines will die from the burns This also will allow a greater hardwood component

Letter: 1723 (EIS appendix J) uneven age cutting disagree , that prescribed burning has limited use for southern pines , uneven age management with fire mimics the mix of pine and hardwood that used to exist

Letter: 1723 (pg 78-79, DEIS) herbicides are not needed for Loblolly Pine regeneration

Letter: 1723 (EIS appendix J) James Baker told me that uneven age management does not have more roads that even-age management

Letter. 1765 Logging must be limited and managed from single-tree to less than 1/2 acre areas, .

Letter: 1774 I prefer the two-aged management or uneven-aged management

Letter: 1801 Instead of extensive reliance on continued even-aged logging, we recommend the use of "selection" harvest that better maintains the ecological integrity of the forest Even-aged logging in the past has resulted in population drops of the endangered RCW

Response Comment noted

Letter: 1633 The recommendation is made to choose single tree selection and upon each entry into a stand only remove the volume of timber which has regrown from the last cutting cycle, approximately every 5 to 10 years

Response See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter 1612 The Circuit Court again rejected the argument that uneven-aged management should be the preferred alternative It is important that the FS utilize all forms of forest management that provide for the continued health and reproduction of our forests

Response. All silvicultural systems and related harvest methods are allowed in the revised Plan, however, some restrictions do apply in MA-2 in compliance with the RCW EIS Current FS policy limits the use of clearcutting but it will be used when it is determined to be the optimum regeneration method as determined by a site-specific analysis.

Letter: 251 We can have selection logging and leave enough forest for the wildlife and our future humans

Issue. 2-1-3 Uneven-Aged Mgmt

Response· Recent direction from the Chief limited clearcutting on NFS lands to areas where it is essential to meet FP objectives and where particular circumstances require it The selected alternative incorporates this direction while providing that regeneration cutting methods be determined on a site-specific basis

Letter: 1723 limit diameter limits to 22 inches under Alt 6 & 7 when I have seen trees that grow over 30 inches in diameter in considerably less time than the rotations I want what is the equivalent age in years for trees that grow in diameter classes of 20-22 and 18-22 and 18-28

Response· The IDT agrees The final revised Plan has been amended to reflect this

Letter: 1310 I believe that overall forest diversity and excellent RCW management can better be provided with selection management, which will better provide the types of stand conditions in which these birds thrived for millennia before the advent of massive logging
Letter: 1453 I urge single-tree selection mgmt for all timber harvests, specially for areas within the 1200 meter RCW colony zones

Response: The choice of harvest methods is based on a site-specific analysis and designed to meet the DFC of the site The environmental effects of the different harvest methods on the RCW is addressed in the RCW EIS This revised Plan incorporates that document

Letter: 1310 in selection management trees of all ages and diameter limits are harvested I suggest that the six best pines and the six best hardwoods on each acre be allowed to live out their natural lives, die standing, providing wildlife snags, and providing fallen logs for other life forms and to reenrich the soil

Response· The decision to retain reserve trees is based on a site-specific analysis designed to meet the DFC of the site to be harvested

Letter. 1392 Start using some of the available modern scientific data which support selective management (even though it's a "bother" for your personnel)
Letter. 1465 Selection cutting should be the only kind of cutting allowed in our national forests
Letter: 1484 Single-tree selection management does leave a forest somewhat intact much to the benefit of the remaining flora and the fauna and humans like myself who enjoy hiking and being in forests
Letter: 1568 promote the selection logging process, which will better maintain the ecological integrity of our forests
Letter 1577 I would like to request that the FS (use) selection logging on national forests
Letter: 1655 FW-163 - Uneven-aged methods should be also considered for ecologically significant areas because an uneven-aged structure will represent natural conditions For example, a combination of group selection and small, irregular shelterwood or clear cut stands would probably best mimic the small even-aged patch dynamics of the original longleaf forest Likewise, single tree or group selection would mimic the gap dynamics of the mixed pine-hardwood forest

Response The revised Plan is a programmatic document, and as such, does not make site-specific decisions Harvest methods are based on a site-specific analysis and designed to meet the DFC of the stand(s) The choice of harvest method on a site will be documented in accordance with NEPA and be available for public review prior to implementation

Letter: 1605 An uneven-aged distribution of pines within a stand would serve to reduce pine basal area compared to mature, even-aged stands Single-tree selection management would produce age diversity within a stand and reduce SPB hazard as well

Response· Prior to a harvest entry, the total pine BA of areas managed with single-tree selection will be similar to areas managed with even-aged methods Regeneration is desirable at least every 10 years with single-tree selection (Baker) After a harvest entry the pine BA will be reduced to approximately 45-60 sq ft/acre which will reduce the SPB hazard at that time The remaining trees plus any regeneration will grow increasing the total BA prior to the next entry increasing the risk of SPB attack

Letter 357 It is inconceivable that the success of the FS policy of selection logging in sensitive areas, begun in 1988, should be ignored by your new Draft Forest Management Plan
Letter: 1631 Reinstatement of even-aged logging within 1200 meters of RCW colonies should not be adopted as proposed in the DEIS

Issue 2-1-3 Uneven-Aged Mgmt

Response: The USFWS in the biological opinion for the court ordered management of the RCW determined it "to likely jeopardize the continued existence of RCW" Regeneration is necessary to ensure a sustained habitat for nesting and foraging The effects of even-aged harvest methods within 1200 meters of RCW colonies are fully addressed in the RCW EIS

Letter: 1649 I have a number of associates that make their living in the timber industry and they say that selection logging is a much better system, and it is much more pleasing to the recreational user such as myself .They claim it is a much more productive method for long-term results and since this is involving private land it seems like it would work just as well for our public companies and recreational users and consider what is best for everyone including the reproductive capacity of the forest and use selective logging and do not use even-age management

Response: The effects of single-tree selection on other forest uses is analyzed in the EIS All alternatives considered in the EIS ensure long-term sustained yield (LTSY) of timber in accordance with NFMA Appendix B of the EIS documents the LTSY of each alternative

Letter 1435 The main point I would like to make is that the FS should use selection cut, not some variety of even-aged management, for most of the forest Uneven-aged management requires time and good silviculture - high professionalism by the FS Should I expect less?

Letter: 1608 Use uneven management - in this way the forest remains looking like a forest and continues to provide necessary habitat for wildlife There would also be less soil disturbance and impact on water quality At the same time, use of this selection harvesting method would not decrease the amount of timber that could be harvested

Letter 1615 Selective management in our National Forests is the only sensible answer if any cutting at all absolutely needs to be done

Response: Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fore, and for other reasons For example, timber sales are used to improve the habitat of the RCW Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc Silvicultural prescriptions are based on a site-specific analysis to meet the DFC Selection harvests are one of the methods available Harvest decisions are based on many factors such as age and condition of the trees, wildlife needs and aesthetics

Letter. 1622 Even-age logging methods and their analogs should, over time, be replaced by selection management practices By shifting to selection management logging practices long term ecological viability should be attainable by favoring species diversity, soil stability, organic soil-substrate integrity, trace metal absorption, through mechanisms such as mycorhiza fungi-plant symbioses, for example

Letter: 1640 Use of single tree selection management in alt 6 would assist the native vegetation and hence wildlife

Response Silvicultural prescriptions are based on a site-specific analysis and designed to meet the DFC Single-tree selection is one of the many methods available Harvest decisions are based on many factors such as age and condition of the trees, wildlife needs, soils and aesthetics

Letter: 1605 The preferred course of action is to manage the entire NFGT with respect to the preservation of biodiversity, as required by the NFMA Such management can be provided by the use of single tree selection as the preferred timber harvest method

Issue: 2-1-3 Uneven-Aged Mgmt

Response. The NFMA of 1976 requires that regulations be promulgated to set forth the process for the development and revision of land mgmt plans The regulations were to include, in part, guidelines for land mgmt plans to achieve the goals of the Renewable Resource Program which (a) insure consideration of the economic & environmental aspects of various systems of renewable resource management, including the related systems of silviculture & protection of forest resources, to provide for outdoor recreation (including wilderness), range, timber, watershed, wildlife, & fish, (b) provide for diversity of plant & animal communities based on the suitability & capability of the specific land area in order to meet overall multiple-use objectives, & within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan, (16 USC 1600, sec 6 (g) (3)) The FS regulations implementing the NFMA planning requirements are found in 36 CFR 219 The following direction regarding diversity is found at section 219 26 Forest planning shall provide for diversity of plant & animal communities & tree species consistent with the overall multiple-use objectives of the planning area Such diversity shall be considered throughout the planning process Inventories shall include quantitative data making possible the evaluation of diversity in terms of its prior & present condition For each planning alternative, the interdisciplinary team shall consider how diversity will be affected by various mixes of resource outputs & uses, including proposed management practices Additional requirements for diversity are located in sections 219 27 (a) (5) & 219 27 (g) Mgmt requirements for both even-aged & uneven-aged mgmt systems are found in 36 CFR 219 27, particularly in sections 219 27 (c) & (d) Biodiversity & vegetation manipulation were two of the major issues addressed in the EIS Discussions of how the alts relate to these issues are found in Chapter 2, pages 28-32 A summary of environmental consequences of the alternatives by issue is included in Chapter 2, with sections on biodiversity & veg manipulation found on pages 44-46 Alts 1-5 allow for both even-aged & uneven-aged mgmt systems with variations in emphases between the 2 systems Alts 6&7 allow use of the uneven-aged system only The determination of which mgmt system to use is made on a project-level, site-specific basis, incorporating information from the Ecological Class System, the Mgmt Area's DFC, objectives & mgmt requirements, which will ensure that diversity is maintained

Letter. 1310 Prescribed fire can be used in selection management, though not as indiscriminately as in even-aged management According to forester Gary Burns, "If the canopy is 15 feet or higher, most pines will survive a prescribed burn " Mr. Burns indicated that prescribed fire could be used on about a 15-year cycle in uneven-aged stands

Letter: 1632 Uneven-aged systems could be used with regular fire based on longer entry cycles (20-30 yrs) and adjustments in fire frequency to allow some extended fire-free periods (5-12 yrs) for seedling establishment But with more open stands and regular prescribed fire, seedling establishment would likely occur on a regular basis Fire would in fact be a necessary thinning agent Longer entry cycles in general allow for greater time to recover harvest-related soil disturbance

Response: Research has shown that the role of fire in uneven-aged mgmt is significantly reduced

Letter: 1604 Recommendation - MA 1 Apply individual-tree selection wherever felling is done
Letter: 1605 Recommendation (MA-1) Apply individual-tree selection wherever felling is done
Letter· 1605 Recommendation Apply individual-tree selection wherever felling is done

Response: Single tree selection is one of the harvest methods available Harvest decisions are based on a site-specific analysis to meet the DFC

Issue: 2-1-4 Timber Sale Costs and Revenues

Letter: 8 I do hope the Govt is getting full market value for its timber
Letter. 495 It is certainly time that we no longer sell or lease our public resources at prices below fair market value - and even then perhaps the loss in resources is not worth the monetary gain
Letter: 1261 I believe that the lumber/logging industry deserves to cut trees, I do not believe we should allow this in a manner of subsidization or cheap government land either Make them adhere to the same rules and hardships as other businesses
Letter· 1435 Good management means not only growing and cutting timber but also selling it at a good price If the bids are low leave the timber stand, let the private sector sell at the low price This will soon bring the price up and then the bids will be better It is not how fast you sell but how well you manage over the long term
Letter: 1451 Let's sell the rights to lumber at fair market value

Issue: 2-1-4 Timber Sale Costs and Revenues

Letter: 1456 I find the USFS's policies reprehensible They are destroying and giving away this nation's (i e taxpayers and future generations') resources & assets to the benefit of a few timber companies The U S Forest Service has committed national rape for years

Letter: 1566 *Selling timber for below market value violates the trust of the real owners of these resources (the American people) Doing so distorts the* market place by giving unfair advantage to those with access to public lands

Letter 1639 I object to the practice of selling lumber at a loss to the taxpayer

Response. NFGT timber sales are advertised and sold by sealed bids to the highest bidder The NFGT do not have a "below cost" timber sale program Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than $15 million in revenue from timber sales, and just spent about $5 million on timber sales and all the other costs associated with timber sales The net revenue to the U S Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY

Letter 370 *I was appalled to see how much land is used for timber use - and sold at below market value' Taxpayers should not pay for you to undercut prices of* private land owners

Letter 585 we must stop subsidizing the timber industry and other for-profit organizations

Letter 717 the excess sale of cheap timber is a definite case of the love of money taking precedence

Letter 843 I strongly object to the FS subsidizing the destruction of our national forests by timber companies

Letter: 1452 I hope the day comes when the Forest Service looks after the health of the forest instead of the wealth of the timber industry

Response: Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons . to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons For example, timber sales are used to improve the habitat of the RCW Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further *improve the habitat by controlling undesireable mid-story vegetation, by installing artificial cavities in trees, etc* The NFGT do not have a "below cost" timber sale program Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than $15 million in revenue from timber sales, and just spent about $5 million on timber sales and all the other costs associated with timber sales The net revenue to the U S Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY

Letter. 1509 Harvested trees are sold overseas much too cheaply

Response: We are unaware of any unprocessed logs from the NFGT being exported

Letter: 330 *We need to reduce and eventually eliminate government subsidy of timber management We as a country need to actively pursue and encourage paper* recycling in this country I realize you may have very little power to change anything, but I support anything you can do

Response: Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than $15 million in revenue from timber sales, just spent about $5 million on timber sales and all the other costs associated with timber sales The net revenue to the US Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY

Letter: 1609 The forest products companies are turning East Texas into one giant tree farm The national forest should be for the people, not large corporations

Issue 2-1-4 Timber Sale Costs and Revenues

Response Harvesting trees is a forest management tool that can achieve multiple objectives, particularly in providing various types of wildlife habitat The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness, and determine for management systems, harvesting levels, and procedures " Not providing for some level of sustained timber harvesting would put us in violation of the law

Issue 2-1-5 Rotation Ages

Letter: 1723 (pg 96 plan) your rotations are far too short since most will be 80 years You need rotations of 300 years for LLP, 250 years for shortleaf pine, and 200 years for loblolly pine. your diameter limits are smaller than what pines grow now in the SHNF
Letter: 1723 MA-2-115 - the rotations are too short

Response: Comment noted

Letter· 1632 rotation ages in MA-1 should be increased to the same as those proposed for MA-2

Response: The different rotation ages in MA-1 and MA-2 reflect the different management emphasis of the areas

Letter 1671 Draft Plan, P 91, Rotation Age and Diameter Guidelines Table The diameter limits presented will not match the ages needed to attain "old-growth" They also make the use of fire essentially ineffective

Response: The IDT agrees The final revised plan has been amended to reflect this Diameter limits will be based on a site-specific analysis

Letter: 1723 rotations you give for Alt 6 & 7 mentioned above give smaller diameter trees than are needed for LA Black Bear (need 36") for den trees

Response: Preferred habitat for the LA black bear is bottomland hardwood which occurs in MA-4 MA-4 is classified as unsuitable for timber production therefore no rotation ages are applicable

Letter: 1310 Rotation ages given for alt 4B are inadequate On public forests, the rotation age needs to be some compromise between economic maturity and potential lifespan

Response TX is recognized as an area with a history of SPB epidemics (see ams/5 yr review) Allowing large acres of loblolly or shortleaf pine habitat to exceed 80 year rotations could potentially develop catastrophic situations Rotation ages are based on the best available information to supply a continuous supply of high quality RCW habitat in perpetuity 80 year rotations will ensure large areas of older forest without the risk of catastrophic events or SPB epidemics Potentially a significant number of trees that are much older than the stated rotation ages will be present throughout the HMA In TX, should the 80 year loblolly pine rotation for SPB considerations be implementated, all overstory trees will be left in perpetuity All clusters, recruitment and replacement stands will have no rotation established and would remain until they no longer provide suitable nesting habitat These stands will provide numerous stand sized (10 acres or larger) patches throughout the HMA that allows the older forest or relict tree characteristics to develop

Letter· 1723 (MA-1-93) I am against all these rotations because they are not long enough and not ecosystem management based

Response: The IDT is not aware of any documented research to support this

Issue: 2-1-5 Rotation Ages

Letter: 1723 (pg 20, DEIS Summary) the rotation ages you use are too short Loblolly Pines should have a rotation age of 200 years, Shortleaf Pine 250 yrs, and Long Leaf Pine 300 years Upland and Bottomland Hardwoods should have no rotation age I do not support diameter limits on any of these trees but let them grow as large as they will

Response: Designation of rotation ages or tree diameter limits is used to design mgmt schemes that seek to strike a balance in satisfying the many demands placed on the NFs

Letter: 1603 Rotations are unnecessarily long outside the HMA NFMA regulations require that minimum rotation ages be at least 95% of culmination of mean annual increment In Texas, the CMAI occurs around age 35 The DEIS does not explain why the minimum rotations outside of the HMA need to be longer than CMAI

Response Rotation ages are chosen to provide forest conditions that meet the DFC

Issue: 2-1-6 Restoration

Letter 1409 Long term control (SPB) would be the planting of longleaf pine and a better rotation of shortleaf pine This is a good reason not to have Wilderness Areas (SPB control on trailside areas)

Letter 1655 MA-1 & MA-2 - For restoration of even-aged regeneration of longleaf and shortleaf communities, site preparation techniques should be utilized that *maintain natural diversity of ground cover species*

Letter. 1723 MA-8f-91 - I am opposed to any timber harvesting for any reason

Letter: 1723 (pg 76, DEIS, Shortleaf Pine) I do not favor clearcutting or two-age cutting but favor uneven-age management with no site preparation or herbicide use

Response· Comment noted

Letter 1723 MA-4-115 - must be eliminated

Response: The purpose of streamside zones is not to set aside and not manage, it is also not to manage for timber Purpose is for management for wildlife and recreation and to protect streams

Letter: 1723 (pg 64 DEIS) herbicides are not needed to restore longleaf pine Single tree selection and fire can help an area recover with judicious use of group selection to start LLP in small openings

Response. The use of single-tree selection without herbicides has not been well researched The NFT will only use such methods on an experimental basis until they (methods) are proven effective and environmentally sound

Letter: 1605 Restoration of longleaf pines is a favorable objective, but this should not be done under the guise of SPB hazard reduction "Aggressive" clearcutting/conversion of loblolly stands to longleaf only reduces SPB hazard in the hundreds of forested acres are wiped out' Conversion back to longleaf needs to be done gradually

Letter: 1605 Even-aged stand conversion, proposed to benefit the RCW recovery by increasing the amount of longleaf pine, should be avoided in favor of uneven-aged management, preferably single-tree selection, within RCW zones

Issue: 2-1-6 Restoration

Response: The FEIS has included additional information relative to clearcutting and pine restoration Though selection management can be used in restoration, costs are high, success is low and time required to achieve site "restoration" is much greater

Letter: 1605 the 'restoration' of short-leaf pine results in less short-leaf pine than currently estimated by the USFS to exist The NSFS needs to explain the justification for reducing the short-leaf pine component of the NFGT while claiming to be restoring the species

Response: Shortleaf sites that have loblolly or slash are being converted to shortleaf, but shortleaf that is on longleaf sites is being converted to longleaf

Letter: 1460 Restoration of longleaf pines is a favorable objective, but this should not be done under the guise of SPB hazard reduction "Aggressive" clearcutting/conversion of loblolly stands to longleaf only reduces SPB hazard in that hundreds of forested acres are wiped out! Longleaf restoration should be done gradually

Letter: 1632 agree with the classification of the Mayflower Uplands LTA as a dominantly longleaf type I feel that the other LTAs classified as longleaf dominant did in fact contain a significant or even co-dominant component of other forest types It is the Sandy Uplands and Clayey Uplands that I have concerns about restoration goals Zealous longleaf restoration should not seek to homogenize these currently diverse mosaics I support low-impact enhancement of the existing longleaf components,

Response. Some stands may be converted by thinning, discriminating against the non longleaf, however, some stands may require more intensive mgmt strategies Most of the sites best suited for longleaf pine are in an HMA and the RCW EIS describes the treatments allowed

Letter: 1723 (pg 30 DEIS) what does Total Restoration mean? This is not clear

Response: Total Restoration is the title of the chart depicting acres restored to longleaf pine and shortleaf pine by period by alternative

Letter: 1605 MA-8a-04 - "Allowing" existing non-native communities to revert to native plant communities is insufficient Active measures need to be taken to restore native vegetation

Response The FEIS identifies plans to actively restore native forest communities when that will best meet the DFC

Issue: 2-1-7 Salvage

Letter: 1655 MA-1 & MA-2 - Uneven-aged management should also allow for the retention of relic trees as in the shelterwood with reserves method

Response: Comment noted

Letter: 1453 Salvage cutting is far too aggressive

Response: The IDT does not understand the rationale for this statement

Issue: 2-2 Reforestation/Intermediate Stand Management

Letter. 1595 It would be nice if you would reseed for longleaf pine in Sam Houston and other forest areas

Issue: 2-2 Reforestation/Intermediate Stand Management

Letter: 1605 MA-8b-04 - Maintaining the appearance of an old growth forest is insufficient the river corridor must be maintained as an old growth forest
Letter: 1632 Pine type restoration activities will range from thinning and/or burning to entire stand replacement (slash pine) general guidelines (see letter 1632)
Letter: 1655 FW-171 - The standards from the Veg Mgt FEIS should be reviewed and amended as necessary to allow flexibility and innovation in silvicultural practices in order to achieve ecosystem management goals
Letter: 1723 I oppose site preparation and use of herbicides
Letter: 1723 (FW-165) I am against this because clearcutting is allowed when only 20% of the height of the trees nearby occurs This ought to be 40%
Letter. 1723 (FW-169) I am against genetically improved seedlings

Response: Comment noted

Letter· 337 One lifetime is not long enough to wait for forest re-generation along the trail

Response. Trees, like all living things, do not live forever When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again Trees planted in 1920 are now 60 years old, stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc Regeneration ensures today's forests will be here tomorrow All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended

Letter· 1671 It is a good policy to have some genetically improved stands scattered throughout the forests, depending on particular genetic selection goals This does not infer use of non-native species The vigor of these stands may be greater than many of the degraded "natural stands" whose gene bank came from a few trees along a fence or trees escaping the saw because of phenotypic inferiority

Response: The IDT appreciates your support

Letter 1723 (pg 45 DEIS) you do not need site preparation to allow reseeding of trees Logging provided enough disturbances to allow reseeding You also can always girdle trees to allow LLP and do not need to use herbicides

Response: Natural regeneration is used with various harvest methods such as seed-tree, shelterwood, two-aged methods, and single-tree selection Site preparation may be necessary to prepare the seed bed prior to seed fall The choice of site preparation is made on a site-specific basis and documented in the project level environmental document.

Letter: 1659 I do not want to see the NF become a commercial timber farm If ecosystem protection is a first priority, then we shall always have a forest suitable for multiple uses Timber farms are not good for wildlife, recreation, etc

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " in accordance with FLPMA Section 103 (c)

Letter: 268 My wife & I . want the REAL E Texas forests to be there for our daughter - not just plantation growth

Response Like all living things, trees do not live forever There will always be some trees throughout the NFT The mix of species on a site, pine and/or hardwoods, will be based on the ECS This will ensure a variety of habitat conditions in response to the varying needs of different wildlife species

Issue: 2-2 Reforestation/Intermediate Stand Management

Letter: 858 The verdict on clearcutting versus select-cutting is still out. The appearance of the forest after a select-cutting for timber sales is very appealing and with a minimum initial impact to the trail, but are we getting enough pine re-generation

Response: *Establishment of regeneration is necessary with any silvicultural system whether is even-aged or uneven-aged Areas where single-tree slection is* used will be monitored for regeneration If regeneration is not established the area will have to be re-analyzed and corrective action taken

Letter: 1137 I recently traveled through the beautiful Ouachita National Forest in Oklahoma and Arkansas Though it is gratifying to see the re-forestation of harvested pine - what about the hardwood trees? -And, undergrowth destroyed? I would be interested in a response, please, as there might be some information regarding the hardwoods that I'm missing Is it the same in Texas?

Response: The NFT has regenerated the pine and hardwoods on a site at the same time The 1987 plan called for a 30% hardwood component in pine stands The revised plan will base the appropriate mix on ECS Undergrowth is usually removed to allow the sunlight necessary for seed germination to reach the forest floor The undergrowth is not destroyed permanently but treated similar to cultivating a garden

Letter: 1632 Ecosystem management must embrace variable spacing and depart from too-uniform and too-dense spacing criteria

Letter: 1671 The pine regeneration figures for loblolly and shortleaf pine are too high A total of 300 to 400 well spaced seedlings should be enough to adequately regenerate most sites to a pine of pine dominated stand A density of 600 to 900 seedlings limits the production of herbaceous and shrub vegetation that many wildlife species depend on The Dept recommends that the previous guidelines contained in the FEIS for Vegetation Management in Coastal Plain/Piedmont be amended to allow for a reduction in pine density

Response: The seedling stocking guides are just that - guides The upper limit is the point at which a stand should be evaluated for pre-commercial thinning Natural mortality is usually considered sufficient to maintain the stands health prior to that point A 3-year average survival check for all species indicated a less than 70% survival rate

Letter: 1723 (pg 16 DEIS) Alt 1, the regeneration size of 80 acres is too large It needs to be 1/4 acre or less

Letter. 1723 (FW-166) 80 acres is much too large as is 40 acres The limit should be 1/4 acre or less Also, no exceedence must be allowed for natural catastrophe, which is not defined

Response: The 80 acre figure is the maximum even-aged regeneration size allowed under 36CFR219 27(d)(2)

Letter: 1723 *I am against any site preparation I am also against FW-171-17*

Response. This standard is incorporated from the Veg Mgt EIS and is analyzed and the effects disclosed in that document

Letter: 1655 FW-169 - For restoring native pine communities, local natural seed sources should be utilized

Response: The parent trees of genetically improved seedlings are Texas trees Sufficient parent trees are available to provide a diverse genetic base

Letter: 1510 The 0-15 year old stands in early succession listed in alt 4B is much too low (3444 acres) Common sense tells me that even if you are growing on a 100 year rotation (which is much too high), you should have at least 15% of your forest in 0-15 year old stands, which is nearly 90,000 acres

Response: Existing now Mgmt Area #1=26,551, Mgmt Area #2=56,792, Total 83,343 Acres In the final alt we will be looking at converting 16 to 20 thousand acre per period, therefore, in future period this number will drop to between 32 & 40 thousand acres

Letter: 1723 (EIS appendix J pg 2) further destructive timber cutting practices that you describe include site preparation and nursery and superior seedling plantings These impact the genetic diversity that naturally exists in a stand on a site This means less nutrient and organic material incorporated back into the soil and less aeration of the soil

Issue: 2-2 Reforestation/Intermediate Stand Management

Response: This section is a more detailed description of even-aged regeneration methods than offered in the glossary It is not intended to detail all forestry practices associated with the various harvest methods

Letter. 1723 (pg 78 DEIS) you are showing your bias again against Alt (6) saying there will be little LLP

Response: The IDT does not understand what this comment refers to

Issue 2-2-1 Pine monoculture

Letter: 19 Monoculture may serve some purposes but not function as a normal, native forest
Letter: 58 National Forests must be "managed" in order that they do not get completely cut down and turned into a plantation of pine trees
Letter. 61 What passes for forest management ends up with a monoculture This is not "conserving the biosystem", it is tree farming
Letter. 399 A monoculture is stupid and non-sustainable
Letter: 1388 Let me urge you not to continue to operate the national forests as a tree farm There aren't enough trees in the national forest to pay for the sacrifice
Letter: 1453 The use of NF for monoculture clonal pine cultivation harms the diversity of habitat that would otherwise be provided, and damages the variety of genetic makeup that serves to protect timber from disease, such as the SPB
Letter: 1455 It is very distressing to drive through areas where only pines now grow and to realize the many species that once grew in these areas

Response: The NFT does not manage for pine monocultures but for longleaf pine, xeric and dry-mesic oak pine, mixed loblolly-hardwood, mesic hardwood and bottomland hardwood communities These are described in detail in Chapter III Part I(a) of the EIS The effects of each alternative are analyzed in the same section

Letter: 52 I'm tired of seeing all pine, all the same size, and all in a row

Response. The IDT believes you may have mistaken some industry land/private land for FS land The 1987 plan called for a 30% hardwood component in pine stands and the revised plan allows the appropriate mix to be determined on a site-specifc analysis using ECS NFT relies heavily on natural regeneration and seed fall is usually distributed over the entire area

Letter. 435 tree farms should be the only legal way to harvest
Letter: 859 I've seen beautiful forest destroyed and pine plantations that does not provide anything for game and wildlife but a hiding place
Letter: 1087 The NF should be managed for the public good, not the lumber companies good When trees are cut all types are taken But only pines seem be given the chance to grow back Animals cannot live on pines alone Without wildlife there is no NF
Letter: 1287 It's very depressing to drive our highways and see acres & acres of land planted with the same kind of tree we know that birds & animals & insects need a variety of foliage to feed on and to hide in Please don't let them destroy the food chain
Letter: 1461 East Texas NF land is just about nothing but commercial pine monoculture, which is NOT true forest, though you referred to it as "forest" There IS a difference
Letter: 1596 These are FORESTS not tree farms'
Letter: 1670 You, The USFS for some reason, are turning the National Forests of Texas into pine plantations for the timber interests (and road builders)
Letter: 1778 Forests should not be pine plantations

Issue. 2-2-1 Pine monoculture

Response: Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fore, and for other reasons For example, timber sales are used to improve the habitat of the RCW Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc Silvicultural prescriptions are based on a site-specific analysis to meet the DFC Selection harvests are one of the methods available Harvest decisions are based on many factors such as age and condition of the trees, wildlife needs and aesthetics

Letter 1640 Why are monocultures of longleaf and shortleaf considered native? They'd be native if diversity were present and selection management were used for timber production

Response· Historic records indicate longleaf pine & shortleaf pine did occur as pure pine stands Shortleaf pine did also occur in shortleaf pine-hardwood stands

Issue 2-3 Prescribed Fire

Letter: 1310 Recommendation No prescribed burning is allowed within SMZ's Wildfires may be allowed to burn under prescribed conditions

Letter: 1409 I feel strongly that to maintain a safe trail, one with the less danger of fire, and to help keep out non-native plants CONTROL BURNS ARE NEEDED

Letter: 1605 Recommendations (MA-1) all (at least 30 BA) consignment of trees older than 100 years in age, to stay until they fall naturally, 3) Reduce the intensity of midstory and hardwood removal, 4) Phase in longleaf pine for slash pine, on appropriate sites by selection felling (never by even-age), 5) Continue augmentation and artifical cavity installation judiciously

Letter· 1605 Recommendation No prescribed burning is allowed within SMZ's Wildfires may be allowed to burn under prescribed conditions

Letter· 1636 I suspect that prescribed fires will have an impact on neotropical birds and I suggest if you do not have data on this it would be good to develop

Letter 1655 FW-063 - The Veg Mgt FEIS should be reviewed and amended as necessary to allow more flexible prescribed burning programs to meet ecosystem management goals rather than just silvicultural objectives

Letter: 1655 The proposed prescribed burning for MA-2 should enhance ecosystem values in longleaf and possibly shortleaf systems However, on the loblolly stands of Sam Houston NF, a frequent burning regime of 2-5 years would exceed the expected natural fire frequency for the ecosystem The open, grassy understory characteristics of this landscape as stated in the DFC may be contrary to natural conditions in many areas of the forest The open conditions that favor RCW could possible be achieved in older, high-canopied forest conditions (80 years+) with infrequent fires (10 year frequency) that inhibit midstory development, although chemical and mechanical methods may also be necessary The development of the BCS for this area of the forest should be used to establish DFC in conjunction with the mandate to protect RCW

Letter: 1671 The USFS needs more flexibility than permitted in the FEIS for Vegetation Management in the Coastal Plain/Piedmont published in Jan 1989 New concepts concerning the ecosystem management have surfaced since this FEIS was written For example, the Vegetation Management FEIS should be amended to allow for greater scorch heights and increased fire frequencies, as well as more latitude in applying growing season burns If fire is to be used as a tool for effectively restoring and maintaining healthy fire climax ecosystems, then they will have to be much hotter than fires of the past For restoration purposes, it is useless to burn unless the fire is hot enought to control living vegetation, rather than just reducing on-the-ground fuels Perhaps there should be a system developed to measure the effectivness of burns in terms of the desired result, rather than the number of acres burned per year

Letter: 1671 With decreasing budgets and personnel limitations, it seems unlikely that the USFS will be able to accomplish the burning in this plan The proposed across-the-board burning cycle is not consistent with ecosystem management There are some areas that need annual or biannual burns, others probably every 5 yrs , others every 10 to 15 yrs , and some likely never Some of the hardwood areas can never be winter burned except in exceptionally dry years, perhaps they should be burned then By defining burning cycles by areas or systems, a more reasonable burning work load could be developed

Letter: 1671 The Department recommends that plowed fire lanes not be utilized unless this is the only method acceptable For example, fire should be allowed to burn into Streamside Management Zones (SMZ's) This approach will produce a much more gradual transition between habitat types, and will not produce sharp ecotones

Issue: 2-3 *Prescribed Fire*

Letter: 1671 The RCW, Bachman's sparrow, Louisiana pine snake, Texas trailing phlox, and many other T&E or rare species have been directly impacted by fire suppression The only way these species will be recovered is through an effective burning regime Herbicides will control woody vegetation, but will not restore the native grasses, forbs, and herbaceous vegetation that were once such an important component of the Pineywoods ecosystem

Letter: 1723 (pg 31 EIS) I do not agree that Alt 6 & 7 can only have limited fire use You can burn in these areas periodically too but fewer pines will seed in but this is OK since most of the areas had more hardwood than they do today and less pine

Letter: 1723 ...prescribed fire can be used in the Wilderness to protect ecosystems.

Letter: 1723 (MA-8b-31) no use of prescribed fire is needed in a floodplain

Letter: 1723 (MA-4-31) there is no need to burn in riparian areas for any reason zero reason for firelines since fires can burn out naturally in riparian areas Fires must never be purposely set in riparian areas

Letter: 1723 (MA-9a-32) eliminate herbicide use

Letter. 1723 (MA-9b-43) I am against the use of fire in SPRAs

Letter· 1723 (MA-9a-43) I oppose the use of fire in recreation areas

Letter. 1723 (FW-062, 063) I am opposed to the use of fire lanes in streamside areas and on trails

Letter: 1723 MA-8d-04&05 - fire is not needed in bottoms The only fire that should be allowed to burn here is one that is set by lightning

Letter· 1723 (pg 22, Plan) I am opposed to the use of fire in wilderness areas simply for the purpose of fuel reduction

Letter: 1723 (pg 98 DEIS) You keep saying Alt 6 has an absence of fire but elsewhere you said fire was limited but did not rule out fire you can burn for bogs in Alt 6 which does not rule this type of management out

Letter: 1808 Alt 4b proposes to "prescribe burn" more acres of NF land than any of the other alternatives We support this proposal based on the fact that fire is a critical component in fire-dependent ecosystems However, it is recommended that no restriction be placed on the time interval for conducting prescribed burning (i e , the 2 to 5 yrs specified in the DEIS) More frequent fires may be necessary to convert vegetational communities to the LL pine/little bluestem community

Response· Comment noted

Letter· 1385 Fire is an important factor in maintaining diversity and should be employed where appropriate

Letter. 1767 present policy is adequate in wilderness and other protected areas, but in timber production areas fire is important Prescribed burns should be used every where possible to control wildfires, SPB infestations and promote timber production

Response: The IDT appreciates your support

Letter: 1723 (pg 92 DEIS) you say that water flows would increase in Alts 2-7 due to more intensive burning which reduces uptake by encroaching trees and brush But previously you said that there would be little burning under Alts 6 and 7

Response: Thank you for bringing this to our attention

Letter: 991 You are proposing an almost three-fold increase in prescribed burning, going from the current 354,734 acres to 997,159 acres While we agree with the need for more burning, we do not believe the public will tolerate that much deterioration in local air quality You will be very fortunate to increase your burning 50% We would suggest greater use of growing season burns and a longer cycle between burns

Response: The 1987 Plan projected 827,800 acres prescribed burning so the Revised Plan only increases burning by about 20% Growing season burns will be emphasized where appropriate (page 56-57 Revised Plan)

Letter 1310 Natural fires did not eliminate the hardwoods nor preclude pine regeneration, and properly timed and applied prescribed fires won't either I suggest that any necessary hardwood control be accomplished either by prescribed fire at a natural frequency and by hand tools as a last resort In no case should herbicides be used

Issue: 2-3 Prescribed Fire

Letter: 1461 additional interim devastation by burning young hardwoods plus other native plants so essential for good quality habitat

Response. Burning is delayed in mixed pine-hardwood regeneration areas until both the pine and hardwood are resistant A hardwood component will be maintained where the DFC is mixed

Letter: 1604 Second, the Draft EIS at 36-57, 72-74, 87, makes repeated references to prescribed burning without providing research or documentation as to frequency, intensity, or seasonally of wildfires before human, or before European settlement or at any time Since prescribed burning has a result (generally intended) of reducing hardwoods in favor of pines, DEIS, 57, and of reducing and eliminating other fire-susceptible species in favor of fire-resistant species, it follows that prescribed burning at a frequency, intensity, or seasonally different from in nature (lightning fires) alters the native biodiversity, and therefore violates the National Forest Management Act, Sec 1640(g)(3)(B) Therefore, the Forest Service must conduct adequate research and provide adequate analysis before conducting prescribed burning

Letter: 1605 Recommendation (MA-1) Do not prescribe burn at a greater frequency, intensity, and seasonality that there is scientific evidence to compare with lightning fires

Letter: 1605 the Draft EIS makes repeated references to prescribed burning without providing research or documentation as to frequency, intensity, or seasonality of wildfires before European settlement or at any time Since prescribed burning has a result (generally intended) or reducing hardwoods in favor of pines, and of reducing and eliminating other fire-susceptible species in favor of fire-resistent species, it follows that prescribed burning at a frequency, intensity, or seasonality different from in nature (lightning fires) alters the native biodiversity, and therefore violates the NFMA the FS must conduct adequate research and provide adequate analysis before conducting prescribed burning

Letter: 1679 The Draft FP does not include research or documentation of the benefits of prescribed burning There is specifically no research or documentation showing that the FS frequency of burning has any relationship to natural burning Burning alters native biodiversity There should be no burning at a frequency more often that naturally occurring, or in seasons other than natural seasons when burning occurs

Letter: 1679 The Draft FP includes too much prescribed burning, it will severely effect bio-diversity

Letter 1723 burning large acreages you do in 3-5 yr and 2-5 yr intervals does not mimic the natural fire frequency suggested in you Appendices H & I

Response: Lightning fires were only one source of pre-settlement ignition Native american burning is also part of the fire history of these areas The planned burning cycles are part of the overall mgmt intended to produce the DFC's The DFC's provide the diversity required by the NFMA

Letter: 1604 Recommendation - MA 1 Do not prescribe burn at a greater frequency, intensity, and seasonally than there is scientific evidence to compare with lightning fires

Response: Lightning fires are only one source of ingition Native american fires were also a factor Also, we have no mandate to limit burning to that comparable to lightning ignition

Letter 1604 The DEIS at 56 points out the absence of prescribed burning in wildernesses since 1983 (actually 1978 under RARE II) and admits that wildfires there have been "insignificant", yet fails to grapple with this indication that the planned 3-5 year prescribed burn frequency in MA 1 and MA 2 is far more frequent than in nature

Response: Wildfire suppression usually prevents large fires developing from each ignition The fact that wildfires have been ignited from within the wildernesses does not mean that these areas would not have burned from natural ignition outside the wilderness boundaries The fire history of these areas also include native american burning, which has not been present in the last 100 + years

Letter. 1453 Prescribed fire is adopted as a silvicultural and wildlife management technique despite the relatively limited understanding of the role of fire in its effect on suppression or encouragement of species The impacts of seasonally, fuel levels, ambient temperature, humidity, and other aspects are too complex for wholesale adoption of prescribed burns as some sort of panacea Until the effects of fire are better understood, a more prudent course would be to limit suppression of natural fires rather than start artificial fires

Letter: 1605 Prescribed fire, when used, should be based on natural rates of occurrence

Response: Prescribed fire is used to meet the DFC

Issue: 2-3 Prescribed Fire

Letter: 1605 use of prescribed fire as described for areas MA-1 and MA-2 will " greatly reduce or eliminate some of the hardwoods from these areas " Issues which need to be discussed, but which are not, 1) which hardwoods are expected to survive such frequent burning, and ii) what are the implications for SPB control in areas from which most, if not all, of the hardwood component has been intentionally removed by frequent prescribed burning,

Response: The use of prescribed fire will not eliminate hardwoods from the NF The forest communities to be managed are described in Chapter III, Part I (a) of the EIS

Letter: 1605 The use of prescribed burning is overdone Natural fires do not occur with the frequency proposed by the USFS, not, in general, at the time of year favored by the USFS

Letter: 1640 Prescribed fire, like site preparation causes wildlife to enter surrounding territory already occupied to compete for habitat Alt 6 is superior to alt 4B for wildlife because alt 6 includes a lot less acreage for prescribed fire Alt 6 may be closer to the frequency of natural fire

Letter: 1679 Natural and past burning frequency should be documented, and prescribed burning should not be more frequent than naturally occurring grass fires

Letter: 1723 (pg 31 DEIS) your burn frequencies are too frequent and do not approximate natural fire frequencies for the ecosystems to be managed

Response: The prescribed fire will contribute to meeting the DFC While they are at a frequency probably comparable to presettlement times, there is no mandate that they mimic lightening strike "natural" fires

Letter: 1310 Past burning practices aimed at creating a monoculture of pine are unacceptable Prescribed burning must be based on research into the dynamics of the ecosystems where prescribed fire is used

Letter: 1626 Some use of controlled burning This is important in trail maintenance and I think is necessary to prevent major forest fires down the road

Letter: 1632 Proposed burning levels for alt 4b are unreasonably high Prescribed fire dollars should be spent to maintain a finite number of acres in high-quality fire climax condtion I recommend that about 1/3 of the forest experience a 2-5 yr return interval, 1/3 experience a 5-10 yr return interval, and the rest remain unburned My preference is for district managers to have the flexibility to maintain high-quality fire climax areas and high-quality unburned areas, rather that forest-wide mediocrity due to mandates for evenly-spread prescribed fire dollars

Letter: 1723 (FW-061) Your use of fire here is too open ended and allows you to burn whenever you want for any purpose and do so subjectively and without explaining you do it primarily for timber management

Response: The use of prescribed fire is to help meet the DFC of the areas

Letter. 1723 (MA-3-33) is 3-5 years the natural fire frequency for this area? If so then you need to document this with the information you gathered

Letter. 1723 MA-8d-A2 - Any burning must be done at the natural frequency, regime, intensity, and season

Letter: 1723 do not agree with your fire frequency because 2-5 years is not the natural fire frequency for these trees

Response· The 2-5 year burning cycle is intended to help meet the DFC of the areas burned

Letter. 1310 I support prescribed fire as long as it follows as closely as possible the frequency, seasonally, intensity, and distribution that used to occur naturally It is up to the FS to make a good-faith effort to assemble the necessary research documents and, if necessary, undertake new research to determine how these factors operated in the pre-settlement forests

Letter 1723 Prescribed burning has not mimiced the frequency, regime, intensity, and seasonality of natural fires and this plan does not apppear to radically change the way you do burning This is not BM implemented in a reasonable way

Letter: 1723 Fire is the natural agent of change and must be used to mimic what disturbance happened naturally Any fire must mimic the intensity, frequency, regime, and season that fire played before humans interrupted the natural cycle (referring to grasslands)

Letter: 1723 (MA-8a-A2) fire can only be used by right season and frequency to simulate natural fire

Letter· 1723 (pg 94 plan) frequent fires in the SW Gulf Flatwoods and SW Gulf Coastal Plain Subsections did not occur naturally Appendix H, states that loblolly is not a fire resistant species and fire frequency associated with loblolly is among the most infrequent of all southern pines So why will you have frequent fires here when this goes against ecosystem management and natural ecosystems?

Letter: 1723 (MA-1-31) the 3-7 years fire interval is too frequent and does not match the historical level of fire

Issue: 2-3 Prescribed Fire

Letter: 1605 use of prescribed fire as described for areas MA-1 and MA-2 will " greatly reduce or eliminate some of the hardwoods from these areas " Issues which need to be discussed, but which are not, 1) which hardwoods are expected to survive such frequent burning, and ii) what are the implications for SPB control in areas from which most, if not all, of the hardwood component has been intentionally removed by frequent prescribed burning,

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Letter: 1723 (MA-1-31) the 3-7 years fire interval is too frequent and does not match the historical level of fire

Issue: 2-3 Prescribed Fire

Response: Ecosystem mgmt does not mean that all mgmt activities must mimic that which would occur "naturally" The prescribed burning cycles are consistent with these fire allocated ecosystems & will help meet the DFC

Letter 1310 The use of prescribed fire in alt 6 is unnecessarily and arbitrarily limited there is likewise no research to suggest a fire interval as long as *60 years*

Response: Research has shown that the role of fire in uneven-aged mgmt is significantly reduced

Letter: 1605 Recommendation Do not prescribe burn at a greater frequency, intensity, and seasonality that there is scientific evidence to compare with lightning fires

Response: Prescribed fire will be used to meet the DFC

Letter: 1640 The effects of fire management on fish and wildlife aren't considered in the alternative as per regulation 219.29a5 Additional burns possible is *to vague for comment Additional burns need to be specified so wildlife impact can be assessed*

Response· The FEIS has been changed to reflect your concerns

Issue: 2-4 Use of Chemicals

Letter: 991 We also suggest the use of herbicides as a major treatment of the mid-story to meet the needs of RCW The public is far more likely to accept selective use of herbicides than a major increase in prescribe burning
Letter: 1252 Stop using herbicidies on hardwoods
Letter: 1310 In no case should herbicides be used to control hardwoods
Letter 1409 Herbicides should only be used as a last resort
Letter. 1453 herbicide application includes too many chemicals and endorses too many indiscriminate distribution methods
Letter: 1604 First, the Draft concludes, without adequate research and documentation that herbicides are necessary to selection management Herbicides are not necessary, as evidenced by the affidavits and testimony of the experts in the record of Sierra Club, TCONR and Wilderness Society v Espy, No L-85-69-CA in the United States District Court for the Eastern District of Texas
Letter: 1605 *The Draft concludes, without adequate research and documentaton that herbicides are necessary to selection* management *Herbicides are not necessary,* as evidenced by the affidavits and testimony of the following experts in the record of Sierra Club, TCONR and Wilderness Society v Espy, No L-85-69-CA in the US District Court for the Eastern District of Texas James Baker, the FS expert on election mgt , has indicated, on direct inquiry, that there is no proof that selection mgt cannot be done successfully without herbicides
Letter: 1605 Pesticides and herbicides should not be used in the NF
Letter: 1616 Exclude herbicide use
Letter: 1617 Exclude the use of herbicides
Letter 1619 Herbicides should be allowed extensively to promote future sales
Letter 1625 I feel that herbicides must be eliminated
Letter. 1631 Herbicides should not be used
Letter: 1636 The failure to use herbicides in NFGT will not fatally harm the timber industry in Texas because of the small portion NFGT's output represents This being so, I see no reason to use herbicides as a management technique
Letter: 1640 Alt 4B puts wildlife and man at risk with the use of pesticides
Letter: 1679 Herbicides are not necessary Hardwoods do not need to be controlled, they form a natural part of the ecosystem, and provide habitat and food sources for insect and animal species that make a forest healthy If hardwoods must be controlled, they should be controlled with hand tools because poisons are damaging to other plant and animal species, including humans
Letter. 1679 Chemicals should not be used to suppress non native species Native species should dominate naturally when re-introduced Manual removal of non-native species should be used when natural suppression doesn't work

Issue: 2-4 Use of Chemicals

Letter: 1723 (MA-8b-101) I am totally against using herbicides
Letter. 1723 MA-5-62 - I am opposed to any fertilization in waters
Letter: 1723 MA-5-02 - I am opposed to the use of poisons to try to control aquatic weeds
Letter: 1723 (MA-9b-53) I am against the use of any insecticides
Letter: 1723 (MA-9a-53) I am opposed to insecticide use
Letter: 1723 (MA-9a-02) I am against the use of any herbicides, pesticides for aquatic weed control
Letter: 1723 MA-2-159 - I am against the use of any herbicides
Letter: 1723 (pg 96 plan) I am against use of any herbicides
Letter: 1723 (MA-4-13) I am against any pesticides or herbicide use in streamside zones
Letter· 1723 FW-031-1-32 - I am against any use of these chemicals in the NFGT
Letter: 1723 FW-056 - I also oppose because it could endanger the drinking water quality in lakes
Letter: 1723 FW-012 - I am against because it allows the use of pesticides to control aquatic weeds This way to reduce aquatic weeds is not by poisoning the water
Letter: 1723 MA-1-15 - I oppose the use of any pesticides to be distributed along forest service land
Letter: 1774 The use of herbicides for an extended period of time (+15 yrs) to restore longleaf pines in areas This is tree farming

Response Comment noted

Letter. 1604 Recommendation - MA 1 Do not use herbicides
Letter: 1605 Recommendation (MA-1) Do not use herbicides
Letter. 1605 Recommendation Do not use herbicides

Response Recommendation noted

Letter: 87 We (respondent and daughter) suffer from severe reactions to minute amounts of chemicals The use and over use of pesticides/herbicides on public lands bars our access and (we) respectfully request that regulations providing for toxic Integrated Pest Management (IPM) programs and appropriate warnings and provisions (be) made for individuals with Chemical Disabilities

Letter: 99 We oppose the use of herbicides in the management of these (Texas) forests
Letter. 721 I oppose the use of herbicides and don't think they are needed .

Response· Use of herbicides and insecticides has been limited on the NFGT in the past few years IPM programs limit but do not exclude the use of pesticides For public protection, all pesticide applications must conform with Federal and State regulations Standards for proper use are found in the Record of Decision of the Coastal Plain-Piedmont Vegetation Management FEIS and the FEIS for the Suppression of the SPB Both documents are referenced in the Plan and DEIS, and many of the standards are reiterated Standards include direction that notice signs are clearly posted around areas where pesticides are applied

Letter· 1632 Though I oppose the use of herbicides as detrimental to native plant communities and EM, its use should be quantified in estimated total gallons to be applied on the Forest

Response Pesticide Use Reports are kept every year, listing gallons applied and acreage covered Estimates of predicted future use are not made The FEIS for Vegetation Management in the Coastal Plain/Piedmont gives estimated acres treated per year

Issue· 2-4 Use of Chemicals

Letter: 1640 The effects of pesticide use on fish and wildlife aren't considered in the alternative as per regulation 219 29a5
Letter 1679 The Draft FP fails to assess cumulative impacts of herbicides and pesticides in ponds, streams, and rivers
Letter: 1679 The Draft FP doesn't include medical costs, loss of productivity etc caused by herbicide exposure There is no research or documentation on the health effects of herbicide use, on the health effects of increased rodent population caused by even-age cuts, or the health effects of increased lyme disease caused by even-age cuts There is no mention of the cumulative effects of herbicide exposure on plants, wildlife, or humans exposed over long periods of time
Letter: 1723 (Grasslands) I am very concerned that the NFGT wants to use poisons in the forests that I visit
Letter· 1723 MA-5-82 - should be eliminated because it will allow poisons to be allowed next to our waters where they can runoff into the waters and pollute them

Response: Effects of pesticide use are detailed in the FEIS for Vegetation Management in the Coastal Plain/Piedmont This document is appropriately referenced throughout the Plan and EIS

Letter. 1723 FW-031-4 - you cannot mitigate death as an adverse health effect
Letter: 1723 FW-031-25 - Your supposition about drift is wrong Drift occurs greater than 100 feet when applying herbicides or pesticides aerially as proposed (by this standard)

Response: This standard is incorporated from the Veg Mgt EIS and is analyzed and the effects disclosed in that document

Letter· 614 One of the things that disturbs me is the amount of pesticides in our water I would like to see the FS develop strategies to reduce and eventually do away with pesticide use
Letter: 1392 Texas voters are tired of unneeded expensive herbicide use

Response:
Use of herbicides and insecticides has been limited on the NFGT in the past few years IPM and site preparation programs limit but do not exclude the use of pesticides For public protection, all pesticide applications must conform with Federal & State regulations Standards for proper use are found in the Record of Decision of the Coastal Plain-Piedmont Vegetation Management FEIS & the FEIS for the Suppression of the SPB Both documents are referenced in the Plan & DEIS, & many of the standards are reiterated

Issue 2-5 Pine-Hardwood

Letter 1632 Midstory hardwoods in pine stands fill a different niche still providing vital mid and lower-level habitat for primary and secondary cavity users including birds, rodents, and reptiles
Letter: 1723 (MA-1) you talk about pine dominated forests but these are not the climax forests of the area which are the southern mixed hardwood forests the succeed pine forests

Response: Comment noted

Letter: 1763 The proposed use of forest management practices to restore hardwood components and to enhance stand structures and age class diversity would also help sustain the irreplaceable plant and wildlife communities that are unique to E Texas excluding logging skids from certain areas, reducing the number of stream crossings during logging operations, protecting turkey roost areas, and retaining snags and hardwood den trees would contribute to these management objectives

Issue: 2-5 Pine-Hardwood

Response. The IDT appreciates your support.

Letter: 1460 Use of natural mixed forest stands would provide the biodiversity necessary to maintain good soil conditions The hardwood component would also serve to reduce SPB hazard

Response: Like all living things, trees do not live forever There will always be some trees throughout the NFT The mix of species on a site, pine and/or hardwoods, will be based on the ECS This will ensure a variety of habitat conditions in response to the varying needs of different wildlife species

Letter: 84 Current practices destroy mixed ecologies

Response: Establishment of regeneration is necessary with any silvicultural system whether is even-aged or uneven-aged Areas where single-tree slection is used will be monitored for regeneration If regeneration is not established the area will have to be re-analyzed and corrective action taken

Letter: 860 outraged and disgusted to see the destruction of our hardwoods!
Letter: 1235 I believe it is important that hardwoods continue to be part of our NF in Texas
Letter: 1263 Please help preserve a mixed-species hardwood/pine forest
Letter: 1409 A balance of hardwood and pine is very important
Letter. 1594 We need more than PINE trees - we need hardwood trees, flowers, animals, birds to keep the balance of nature
Letter. 1605 Hardwoods serve to reduce pine basal areas in a stand Therefore, mixed pine/hardwood stands should be favored over pure-pine monocultures for SPB hazard reduction
Letter: 1632 EM according to the plan endorses a forest-wide reduction of hardwoods in pine stands The term "pine dominated" does in fact allow a lot of room for inclusion of hardwoods in the pine stands EM must ensure that not only do stands contain a hardwood component, but a working combination of hardwoods able to meet diverse wildlife needs from cavity and snag to mast production
Letter· 1632 EM must ensure that adequate hardwoods are retained in pine stands

Response: The revised plan allows for the appropriate mix of pine and hardwoods based on a site-specific analysis using the ECS

Letter: 1723 (pg 78 DEIS) you ignore that the RCW DEIS says that HMA's will be managed mostly for pine

Response: The RCW EIS is developed to provide guidance in pine or pine-hardwood sites This FP describes more specifically land type associations (LTA's) within the USFS ECS that provide these pine dominated habitats LTA's and stands that have a hardwood dominated ecological component will not be included within the pine and pine-hardwood prescriptions for the HMA's Likewise, special areas such as Big Creek Scenic Area, have not been included or calculated into the pine and pine-hardwood habitats for RCW management These specific sites, though completely surrounded by upland pine dominated HMA landscapes, will be managed for the specific character and emphasis described in the RFP for the NFGT The mix of hardwoods in pine stands is based on optimum conditions for RCW and species that prefer similar habitat It is not designed to provide optimum or maximum mast for species that require this habitat Though hardwood control will be an accepted practice, sites with a natural hardwood component will be managed to retain that character If the site is ecologically defined as a hardwood dominated site through the ECS, then it will be managed as such and not as part of the RCW HMA pine dominated uplands Ecological conditions specifically for TX have been described in detail within App A of the DFP and App H of the DEIS for the FP

Letter: 1632 The plan does not mention restoration of hardwood or mixed types which have also suffered widespread decline I have seen numerous stands of beech-white oak clearcut and converted to loblolly

Response: The ECS will be used during site-specific analysis to determine the appropriate species or mix of species on a specific site

Letter. 859 So I would say our FS give timber companies and others the pattern that has been used to destroy our hardwoods for the last 50 years

Response. The revised plan provides for the appropriate mix of pine & hardwoods based on a site-specific analysis using the ECS

Issue: 2-5-1 Hardwoods

Letter: 1632 More hardwoods should be retained and allowed to grow to maturity forest wide
Letter: 1632 Retention of significant clumps and individuals in pine stands and mixed stands must be enforced
Letter: 1723 (Pg 81 DEIS) I do not want cutting of timber in bottomlands
Letter: 1723 (FW-074) I am against the cutting of hardwoods
Letter: 1723 (EIS appendix J pg 11 and 12) I am opposed to any clearcutting of upland or bottomland hardwoods This again contradicts the natural tendency to have uneven age stands

Response: Comment noted

Letter: 1723 Why are aesthetic trees and wildlife trees like magnolias and dogwoods destroyed now with SPB cutting?

Response: The revised plan has standards to protect hardwoods during SPB suppression treatments

Issue: 2-6 General

Letter. 1605 Recommendation Paint marking the limit of the SMZ will be on the side of trees facing away from the stream No trees within SMZ's will be painted except for trees to mark ownership boundaries No ribbons or tape will be put on trees within SMA's except for research purposes and must be removed when research is finished
Letter: 1723 (MA-3-82) I am opposed to timber harvest period
Letter: 1723 FW-203 - this does not work now so why do you think it will work in the future
Letter: 1723 (MA-9a-152) I am against cutting for visual quality and recreation experience or to maintain tall forest cover Do not log these areas period
Letter: 1723 (MA-9b-144, 151, 152) I want no logging for visual quality, recreation experience, maintain tall forest cover, wildlife improvement

Response: Comment noted

Letter: 1310 Recommmendation Paint marking the limit of the SMZ will be on the side of trees facing away from the stream No trees within SMZ's will be painted except for trees to mark ownership boundaries No ribbons or tape will be put on trees within SMZ's except for research purposes and must be removed when research is finished

Response: Recommendation noted

Letter: 1391 I think if you did your homework you would see that your own logging leases do more damage to the environment than anything else

Response: S&G for timber harvest activities and ORV management are in place that would ensure resource protection and/or mitigation Only in cases where these S&G have not been properly implemented, would unacceptable resource damage occur

Letter: 1394 I encourage you to take a more moderate approach to logging, rather than the extreme environmentalist approach you are taking

Response The IDT appreciates your support

Issue: 2-6 General

Letter: 1604 The DEIS fails to reflect any details of monitoring of all the even-aged cuts that the Forest Service has made

Response:
This discussion is found in detail in the 1992 AMS

Letter: 1450 Is the continued destruction of virgin forests happening because in the past replanting was not occurring on a large enough scale? If so lack of foresight in the past is (no) reason to continue the destruction now

Response: The lands that make up the NFT had been heavily logged over prior to their acquisition in the early 30's Most of the pine that today is 60 years old was planted by the CCC These stands are managed to ensure the long-term sustained harvest in accordance with the applicable laws and regulations

Letter: 1617 *Stop finding excuses to salvage cut Protect the forest instead of looking for ways to destroy it*

Response: Salvage harvests capture mortality, i e storm damaged and SPB killed trees The areas are then reforested We are unsure of what you mean by this activity destroying the forest

Letter: 1632 Mechanical site preparation under seed trees all but preclude the survival of sensitive plant communities and should be discontinued, especially in longleaf pine types Burning alone is recommended for site preparation

Response: FP's are programatic documents, while the method of site preparation is based on a site-specific analysis and documented in accordance with NEPA requirements Scoping letters are sent to interested publics prior to any decision being made That is the appropriate time to voice your concern

Letter: 1723 (EIS appendix J pg 7 & 8) have green ash as both tolerant and moderately tolerant You also have bald cypress under hardwood You also have hophornbeam as both tolerant and moderately Which is it?

Response: Thank you for bringing this to our attention

Letter: 1723 (pg 247 DEIS) not all trees have reduced vigor when they get older Plus you are defining this in terms of timber production only and not ecological health for the forest and value for wildlife Optimum age or size is a commerical timber value and not a biological one and is subjective to boot Old growth provides for a vigorous living community

Response: Definitions in the glossary were obtained from the source documents listed on page 224 of the DEIS This terminology was used by the IDT in preparing the revised plan and EIS

Letter 1671 the Service has proposed a management objective of 12 snag/acre to increase populations of some cavity nesters Is there a problem with cavity nesters that this density of snags will alleviate? 12 snags per acre equals about 18 ft of BA Since snags have a maximum standing life of about 10 yrs how can trees be grown fast enough to replace fallen snags and still produce trees for other uses? Perhaps there should be a statement about how scattered insect-killed trees are salvaged and therefore how scattered snags are managed The practice of late is to leave scattered pine snags This is proper except during strong SPB years During the hot portions of the SPB cycle, single infested trees should be removed But during the cooler portion of the beetle cycle, single infested or killed trees should be left standing Can this be incorportated as a guide?

Response: The IDT agrees, the MI Table has been changed to reflect some of your concerns

Issue 3 SPECIAL MANAGEMENT AREAS

Issue: 3-1 Protection of Special Management Areas

Letter. 1310 I endorse the inclusion of all areas as listed for alt 6 in table 3 (except Longleaf Ridge as wilderness)

Letter: 1723 all Special Area Management Areas, no ORV use must be allowed I believe this must also be true for the Stephen F Austin Experimental Forest and all wild and scenic river corridors

Letter: 1763 The designation of RNAs and Botanical Areas to protect unique resources, and utilization of research results to better understand the implications of management practices upon the full complement of biological components would enable managers to adapt management strategies if changes are needed We suspect, however, that some of the areas proposed for inclusion in protected zones should be enlarged in order to enhance their effectiveness and sustainability over longer periods of time

Letter: 1801 we urge special area protection for the remaining roadless areas listed in Appendix D Likewise, we recommend protection for the other special area candidates considered at PP 102-116 of DEIS

Response· Comment noted

Letter. 1723 It should be against FS policy to do any SPB cutting in special management areas Let Nature take its course This is not ecosystem management this is ecosystem destruction Stop the cutting

Response: SPB control in Scenic Areas has proven successful and has protected remaining area from spread of SPB

Letter: 1632 It is noteworthy that many of the sensitive plant communities on the Forest apparently were able to survive turn-of-the-century "high grading" but have disappeared from even-aged plantations established under FS management This is not to suggest "high grading" or that logging in sensitive plant communities occur Rather this strongly suggests that less impactive, lower intensity timber harvesting is necessary to prevent the elimination of sensitive species outside of inventoried areas The Plan has not endorsed protection for all Natural Heritage sites in their entirety All of these sites must be protected in their entirety

Response· The revised FP is a programmatic document that sets direction for implementing the preferred alternative The decisions to be made in this revision can be found in Chapter 1 of the EIS

Letter. 1310 No trees should ever be removed from a scenic area Except for hazard trees endangering humans, no trees should ever be cut But if they are cut for some reason, they should not be removed Otherwise there is always an incentive, an ulterior motive for cutting trees that otherwise might not be cut

Response: Scenic areas are classified as MA-8 & are unsuitable for timber mgmt Any mgmt in scenic areas will be for purposes of enhancing scenic qualities Salvage is permitted in the area(s) when & for the purpose of maintaining and/or enhancing the scenic quality of the area

Letter: 1723 (pg 31 DEIS) Why are you limiting stand management in Alt 6 & 7? You do not explain

Response: The UAM in alts 6&7 will result in stand differentiation by species only

Letter: 1723 (pg 258 DEIS) Special acres, you need a standard for wet soils that will protect these under this category Otherwise they are rutted, compacted, and damaged in other ways

Response Definitions in the glossary were obtained from the source documents listed on page 224 of the DEIS This terminology was used by the IDT in preparing the revised plan and EIS

Issue: 3-1 Protection of Special Management Areas

Letter: 1605 the USFS prescribed burns in Special Areas, poses a significant danger to the viability of those areas, should the impact of the burns be underestimated or control of the burns be lost Given the limited area provided to each ecosystem, the USFS needs to address this concern, and justify the proposed burning scheme vs the potential loss of ecosystems which have been identified by the USFS itself as unique and deserving of special protection

Response Burning plans are developed to ensure that mgmt objectives are met & excessive damage is avoided

Letter: 1655 The preferred alt should provide a special area designation for all Heritage sites included in the 1990 Heritage Report, as well as any additional sites of significant natural quality that have subsequently identified These sites are exemplary core natural areas and should be established in all land-type associations to represent the range of biological diversity and variability on the landscape, and to serve as benchmarks for restoration, management, and research efforts

Response: Many sites described in the 1990 Heritage Report are quite small & will be managed & protected as inclusions in larger stands The more significant or larger areas may be assigned a special area designation

Letter· 1655 FW-023 - should acknowledge that reference sites will include all Heritage sites identified in the Texas Natural Heritage Report of May, 1990

Response: The IDT agrees, MA-8d reflects this concern

Issue: 3-1-1 RNA'S

Letter: 1605 MA-8a-04 - "Allowing" existing non-native communities to revert to native plant communities is insufficient Active measures need to be taken to restore native vegetation
Letter: 1723 I am against any grazing or ORV use in any of these areas
Letter: 1723 (pg 150, Plan) RNA serving as controls but they are too small to serve as this in many cases you need to increase their size so fragmentation does not impact them heavily or study them to see the affect fragmentation has in comparison to large such areas like Wilderness areas
Letter· 1723 (MA-8a-05) I am against any cutting or vegetation removal I also am totally opposed to the use of any chemicals in these areas
Letter 1723 (MA-8a-42) remove "as nearly as possible" or a RNA will be that in name only
Letter 1723 (MA-8a-71) the FS should always measure impacts on RNA from adjacent management activities and natural disturbances
Letter 1723 (ma-8a-94) hunting and trapping should also be removed
Letter: 1723 (MA-8a-121) I am opposed to any tree cutting period
Letter: 1723 (pgs 149-150) says "nonmanipulative research" and "management is designed to maintain the areas in a natural condition by allowing " In other words, no cutting!
Letter· 1723 Cross Timbers RNA-- I am against any grazing by cattle which are not native to the area burning this can be done using the season and frequency and intensity fire regime that naturally occurred I do not support horse use here because horses are not native
Letter· 1723 (MA-8a-A1) the words "protection and perpetuation" may be interpreted to mean that you can manipulate in these areas I do not want this used as an excuse to cut timber
Letter: 1723 (MA-8a-A4) I am opposed to the use of cattle here (Cross Timbers) and particularly allowing them in creeks
Letter· 1723 Mill Creek Cove RNA-- no horse use must be allowed
Letter: 1723 (MA-8a-B1) I am against perpetuation of the Loblolly-Oak plant community a loophole that the FS will use to log

Response Comment noted

Issue 3-1-1 RNA'S

Letter: 1723 private tract in the Neches River Banks RNA needs to be acquired to prevent incompatible land uses

Response: Given sufficient funds, this might be accomplished

Letter: 1453 I urge designation of Boykin Springs, Colorow Creek, Cross Timbers, McGee Bend, Mill Creek Cove, Neches River Bend, and Trout Creek as RNA's
Letter: 1604 Recommendation Designate as Research Natural Areas Mill Creek Cove, Boykin Springs, Trout Creek (including recently acquired inholding of 100 acres), Neches River Bend (FS says "Bank"), McGee Bend (entire peninsula), Colorow Creek, Cross Timbers, and all other non-wilderness areas listed as Roadless Areas
Letter: 1605 Designate as RNAs Mill Creek Cove, Boykin Springs, Trout Creek , Neches River Bend, McGee Bend, Colorow Creek, and Cross Timbers
Letter: 1622 Areas that should receive RNA designation would be, for example places like Mill Creek Cove, Boykin Springs, Colorow Creek and certain botanically sensitive areas containing endangered plant species and identified by the Texas Nature Heritage Program
Letter: 1662 Designate the following as RNA's Mill Creek Cove, Boykin Springs, Trout Creek, Neches River Bend, McGee Bend, Colorow Creek, and Cross Timbers

Response All areas recommended for RNA status by the review committee have been assigned to MA-8a, Research Natural Areas, in this revision

Letter: 1633 Although Mill Creek Cove is listed in MA 8a, its designation is not as an RNA but as a scenic area Given that a formal and favorable review has already taken place and that a significant amount of documentation and amendments to existing document must be produced to approve this RNA after the Plan is approved, recommendation is made to submit Mill Creek Cove to the Chief of the FS for final designation and include it in the final Plan with an official RNA designation

Response. Existing & proposed RNA's were designated as MA-8a

Letter. 1633 Standard MA-8a-81 permits livestock grazing only as part of approved scientific investigation This practice is incompatible with the RNA designation Livestock (which is assumed to be cattle) are not indigenous to north Texas

Response: The appropriate specialists have been consulted to assist with development of mgmt standards that seek to protect & perpetuate the unique *characteristics of special areas*

Issue: 3-1-2 Scenic

Letter: 1058 it is especially important to properly preserve Big Creek areas
Letter· 1310 There are special areas adjacent to the existing Scenic Area (Winters Bayou) that I would like to see included in the addition, including three grass lakes, and area of yellow-fringed orchids, a possible savanna area, and an area of old magnolia trees
Letter: 1434 I favor the addition of Big Creek as protected areas
Letter: 1723 (MA-8c-71) you must measure what the impacts are on the scenic area due to activites and natural disturbances that occur next to the scenic areas
Letter: 1723 (MA-8c-121), I am against any logging in scenic areas
Letter: 1723 (MA-8c-81) I agree no livestock be allowed in these areas
Letter: 1728 We should especially focus on the larger, older ecosystems such as Winters Bayou and Big Creek, for example Winters Bayou area should be protected at least downstream to the Forest boundary, to the Forest boundary to the south & east and FM 1725 on the southwest and west

Response· Comment noted

Letter: 1605 Winters Bayou Scenic Area should include all FS land in Compartment 120 and that portion of compartment 118 to the south of the pipeline

Issue: 3-1-2 Scenic

Letter. 1723 Winters Bayou Scenic Area - I support the expansion of this area You need a map A wilderness designation would be more appropriate

Response Expanding Winters Bayou Scenic Area as a wilderness would cause the inclusion of roads, pipelines, powerlines, oil wells, private land, church, cemetery, and oil field pumping equipment The additional area in part was also considered for special management It was included as a scenic area in the selected alternative

Letter: 1723 (pg 47 DEIS) It is particularly of concern that you allow SPB control in special management areas you are destroying BCSA in order to save it

Response SBP control in scenic areas has proven successful and has protected remaining area from spread of SPB

Letter: 1723 MA-8c-B2 - The mineral rights not owned by the FS must be purchased and the area currently drilled fully restored

Response· Given sufficient funds, this might be accomplished

Issue: 3-1-3 Botanical

Letter: 1605 MA-8a-04 - "Allowing" existing non-native communities to revert to native plant communities is insufficient Active measures need to be taken to restore native vegetation
Letter: 1723 In Boykin Springs grazing must also be removed if you hope to truly restore the Longleaf Pine ecosystem
Letter: 1723 I am opposed to allowing horseback riding in Trout Creek
Letter: 1723 MA-8d-81&82 - all livestock use being illegal There is no need for any experiments with livestock in a botanical Livestock are not native and will hurt vegetation
Letter: 1723 Catahoula Barrens - I am against any tree harvesting period If you need to kill nonnative trees then girdle them
Letter: 1723 MA-8d-B3 - I am against hunting or trapping
Letter: 1723 MA-8d-B4 - no cutting of any kind must be done here
Letter· 1723 Upper Colorow Creek - I am against cutting of any kind I also am against herbicides or pesticides here
Letter: 1723 MA-8d-D1 - there must be no grazing
Letter: 1723 MA-8d-D2 - I am against any logging of the area for any purpose No removal of trees period You can use natural fire and prescribed fire mimicing natural fire to control vegetation or girdle trees
Letter 1723 MA-8d-01 - I am against vegetative manipulation

Response· Comment noted

Letter· 1632 C-20 Ayish Bayou represents a topographical gradient from lower slope to river channel Contained in this compartment are the highest quality mesic slope plant communities on the District Outstanding bottomland communities occur here as well The entire compartment should receive Botanical Area status to assure the highest degree of protection for these exemplary communities

Response Ayish Bayou is a special mgmt area in the revised plan

Letter. 1723 Why do you allow Catahoula Barrens in your chosen alternative but not in alt 6 & 7 you are trying to slant 4b to make it look better than it is

Response Catahoula Barrens is included in the proposed longleaf ridge, which is a proposed wilderness in Atl 6 & a special area in Alt 7

Issue: 3-1-3 Botanical

Letter: 1632 The proposed Catahoula Barrens Botanical Area should be expanded to include C-84 in its entirety and stands 8,9,10,11,12,13,43 and 44 in C-86 The enlarged boundaries better ensures long term viability of unique plant communities and eases enforcement of resource protection measures

Response The primary areas of Catahoula Barrens as described in the TX Natural Heritage Program will be managed by the "Management Recommendations" as *described in the "TX Natural Heritage Program Inventory of NFGT"*

Letter: 1723 Beech Ravines - is in the Sabine and not Sam Houston National Forest

Response: Thank you for bringing this to our attention

Letter· 1600 I must question the uniqueness of the proposed Boykin Springs Botanical Area My understanding of the selection process for this area is that the FS brought in an outside "expert" to find what the FS wanted found. The best way to protect this resource is to not allow logging. All other uses have not damaged the area in the past and will be compatible with the FS's goals in the future

Response: The FS used input from a variety of public sources & agency personnel to analyze the proper mgmt designation for Boykin Springs Mgmt practices & other uses will be designed to preserve & perpetuate the unique characteristics of this area

Issue 3-1-4 Historic & Archeological

Letter. 1723 (pg 210, DEIS) you say that riparian zones are protected for historical areas this is not true You allow cutting in riparian zones

Response: S&G for riparian zones are adequate for protecting cultural resources

Letter: 1309 The Attoyac Bayou, Ayish Bayou, and Cochino Bayou Archeological Areas We support the plan to protect these areas from timber practices and mineral extraction that might affect sites As the Heritage Management Program proceeds, and additional clusters of sites are found along other drainages, similar special management areas should be defined to protect them

Response. The IDT appreciates your support

Issue: 3-1-5 Other

Letter: 1453 *I urge increased acreage for all Special Areas to include contiguous wooded areas*
Letter: 1627 Alternative 4B will sufficiently provide resolution of this issue
Letter: 1632 A greater number of significant roadless areas should be dispersed forest wide to provide habitat for all wide-ranging species that are adversely affected by increasing road densities Roadless area goals should be a minimum of 40,000 acres per Forest in 2,000 to 10,000 acre blocks
Letter: 1723 (WL/Riparian SAs) I am against the use of horses here since they will pollute the water and bring exotic plant seeds into these areas I am against any additional management activities for scenery, fishery, wildlife habitat

Response: Comment noted

Issue: 3-1-5 Other

Letter: 1604 Recommendation Designate as special areas all those listed on pages 111, 114-116 of EIS except a-1) (proposed) Longleaf Ridge, a-2) (proposed) Big Creek Wilderness Area, a-3) (proposed) RNA's and b) Five existing wildernesses This means that areas listed in the DEIS as "riparian" should be made special areas, instead, for better protection.

Response: Recommendation noted

Letter: 1679 The roadless area documentation was inadequate The DFP does not reflect the impacts on other areas of the forest caused by building roads in areas previously roadless This will impact many other parts of the forest, wilderness in particular. Wilderness will be affected because people will be forced to use wilderness areas for the solitude and wildlife observations previously available in the roadless areas More people will impact the wilderness areas

Response: By pure definition, there were no "roadless" areas, except for very small areas Even our designated wilderness areas have roads, pipelines, telephone lines and operable minerals within them Wildlife viewing may take place anywhere on the forest. Some of the best areas are in and/or adjacent to some of the developed recreation areas

Letter: 1808 The bottomland hardwood areas which compromise approx 10% of the total acreage of the National grasslands should be evaluated as a special management area

Response The bottomland hardwood acres are comprised of MA-4, special areas (i e Ayish) and inclusions These areas are protected in the revised Plan

Issue. 3-1-6 Longleaf ridge

Letter: 1058 it is especially important to properly preserve the Longleaf areas

Response: Comment noted

Letter. 1655 We propose that the entire Longleaf Ridge area of the Angelina NF be designated a special interest area with an emphasis on maintaining the integrity of the longleaf pine ecosystem Timber management within the area would be allowed but only to meet the requirements for RCW and other ecosystem attributes ORV use should be de-emphasized here and shifted to other areas of the forest We oppose efforts to designate this area a wilderness or National recreational area This would require Congressional mandates that would restrict the ability of the NFGT to implement a locally-based flexible ecosystem management plan

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter 88 Designate Longleaf Ridge as a National Wildlife Recreation and Conservation Area
Letter: 99 and we support the naming of Longleaf Ridge as a Natural Recreation and Wildlife Area rather than a wilderness area
Letter: 103 I support the designation of a Longleaf Ridge Natural Recreation and Wildlife Area
Letter. 105 We want Natural Recreation and Wildlife Area status for Longleaf Ridge We must stop the logging in this area
Letter: 114 I support the designation of Longleaf Ridge as a Natural Recreation and Wildlife Area as opposed to designation as a wilderness area
Letter 117 I write you to support Longleaf Ridge National Recreation and Wildlife Area
Letter: 365 Regarding the DEIS this organization does not support the designation of Longleaf Ridge as wilderness It would be better if the area were designated a Recreation and Wildlife Area in the Preferred Alternative, with no closing of roads or reduction of recreational activities
Letter: 576 Longleaf Ridge needs special protection There are few areas as unique as it and making it a Nat Recreation and Conservation Area makes sense

Issue: 3-1-6 Longleaf ridge

Letter: 721 I recommend natural recreation and wildlife area status for Longleaf Ridge
Letter: 1310 I prefer Longleaf Ridge be designated a Conservation, Wildlife, and Recreation Area
Letter: 1453 I urge protection of Longleaf Ridge as a 30000 acre Recreation and Wildlife Area
Letter: 1575 recommend that the Longleaf Ridge area be designated a National Wildlife, Recreation & Conservation Area
Letter: 1604 Recommendation Designate Longleaf Ridge Recreation and Wildlife Area, (24,625 acres plus whatever contiguous private lands can be acquired by voluntary exchange), particularly from Temple-Inland
Letter: 1605 Designate Longleaf Ridge Recreation and Wildlife Area..
Letter: 1616 make Longleaf Ridge a National Recreation and Wildlife Area
Letter: 1617 make Longleaf Ridge a National Recreation and Wildlife Area
Letter. 1622 Most environmentalist including myself would like to see most of Longleaf Ridge designated as a National Recreation and Wildlife area
Letter: 1631 I urge you to support Congressional designation of 30,000 acres of Angelina NF lands between Upland Island Wilderness, Lake Sam Rayburn, and the Neches River as Longleaf Ridge Recreation and Wildlife Areas, requiring no commercial logging, and maintenance of native biological diversity
Letter: 1632 I support the designation of Longleaf Ridge as a Special Management Area. designation as National Recreation area Though the area would be removed from the timber base, RCW management and restoration work would still produce timber outputs
Letter: 1639 I would like to see Longleaf Ridge become a recreational area If it is anything like Upland Island Wilderness, it will be a great place for vacationers
Letter: 1662 Designate 25,000 - 35,000 acres of federally-owned national forest land between Upland Island Wilderness, Sam Rayburn Reservoir, and the Neches Rives as Longleaf Ridge Recreation and Wildlife Area, requiring maintenance of native biodiversity, providing for continuation of existing recreational activities, and prohibiting commercial logging
Letter: 1670 Speaking of making money and supporting the local economy, the creation of a large recreation area like the proposed Longleaf Ridge National Recreation Area would do much to bring in tourists and lawabiding persons who would like to retire to the area Corporate and private research grants would come in, creating more jobs Land values should increase (of course, some people would not be joyful about that prospect) State sales tax receipts would increase which would place more funds in city and county accounts
Letter: 1723 (pg 105, DEIS) environmentalists are pushing for other than wilderness status for Longleaf Ridge now and have been for almost a decade We want a National Recreation and Conservation Area
Letter. 1801 We also urge the FS to recommend Longleaf Ridge for Congressional designation as a National Recreation and Wildlife Area
Letter: 1837 support the proposal to make the Longleaf Ridge in Angelina NF a National Recreation Area, the proposal includes continued endurance rides

Response: Designating Longleaf Ridge a National Recreation Area is unfeasible due to the intense mgmt for the RCW However, presently many recreation sites & opportunities abound for the recreationist These areas are publicized through many varied sources

Letter: 1356 Its beauty, wonder and diversity will be destroyed if the FS is allowed to carry out its timber program in Longleaf Ridge The best protection for the area would be to give it wilderness status the biological and recreational value of Longleaf Ridge far exceeds its value for timber
Letter: 1434 I favor the addition of Longleaf Ridge as protected areas
Letter: 1568 Recommend that Longleaf Ridge, which consists of 25,000 acres, be designated as a National Wilderness Area
Letter: 1595 do not cut timber in Longleaf ridge

Response: Making Longleaf Ridge a wilderness is unfeasible due to the intense mgmt needed for the RCW However, many recreation sites & opportunities abound for recreationists Enhancing the longleaf ecosystem will also enhance the botanical areas it contains

Issue: 3-2 Wilderness Allocations

Letter: 11 I would really like to see more wilderness areas in Texas, with no roads through it
Letter: 175 We need the forests, wetlands and fauna as a balance and for peaceful places to rest from a world at war with itself Please leave some of that unspoiled Texas landscape WILD
Letter: 576 Texas has little per capita wilderness or special areas considering a population and geographic area (of) its size We need more wild areas near urban areas

Issue: 3-2 Wilderness Allocations

Letter: 858 I concur that Wilderness Areas should be added, but not in the present people active areas

Letter: 983 Increase the size and number of wilderness/scenic areas

Letter: 991 We are opposed to any further designation or expansion of wilderness areas as proposed in Alternatives 5, 6 and 7

Letter: 1387 I do not appreciate what the wilderness advocates have done in the past 10 years and I will continue to express my opinion in the future Most of the people in the county (Sabine) feel the same way that I do now that they have seen the havoc produced in the Indian Mounds Wilderness

Letter: 1409 the trail has been erased in the LLCW area With down trees it can not be maintained nor is it safe to go in this area This once lovely area can no longer be enjoyed by anyone I am very much against Wilderness in any area where the LSHT is located In fact I am against Wilderness in the SHNF I feel there must be a better way to manage the forest so it can be enjoyed by people today and future generations The Big Creek Scenic Area seems to work better

Letter: 1409 This is a good reason not to have Wilderness Areas (SPB control on trailside areas)

Letter: 1433 More wilderness should be designated

Letter. 1600 Any designation of roadless areas should be postponed until the existing Wilderness Areas are more fully utilized By the Forest Service's own figures, the current Wildernesses are only being used at five percent of their designed visitor use capacity

Letter: 1636 I favor no new wilderness areas because NFGT units are too small to make any meaningful size area

Letter: 1767 I realize that some acreage needs to be set aside but please do not classify any of this land as a wilderness area Besides taking this totally out of timber production it will create a problem in the fight against the SPB

Response: Comment noted

Letter: 1808 App D, Winter's Bayou, p 250-264 Alt 4b does not include provisions to increase the amount of wilderness acreage It is recommended that the USFS consider adding Winters Bayou on the Sam Houston NF as a wilderness area This area supports the rare and declining mature bottomland hardwood ecosystem in east Texas We agree with the use of prescribed fire in Winters Bayou and in existing wilderness areas, as specified in alts 2 through 5 Designation of some of the other proposed wilderness areas (i e Longleaf Ridge and Jordan Creek) would conflict with designation and management of proposed RCW HMAs

Response: Expanding Winters Bayou Scenic Area as a wilderness would cause the inclusion of roads, pipelines, powerlines, oil wells, private land, church, cemetery, and oil field pumping equipment The additional area in part was also considered for special management It was included as a scenic area in the selected alternative

Letter. 617 I believe the majority of Texans want the lands you are entrusted with managing to be fully protected wilderness areas

Response: Fully protected wilderness prohibits any motorized or mechanical use It would also prohibit wildlife management and many other forms of management that provide multiple use

Letter: 858 Adding forest as wilderness area is well worth the loss of timber sales, but here are some suggested guidelines to follow for selecting an area -Do not locate a new wilderness area in a people active area, as there maybe to many uncontrollables -Do not locate a new wilderness area that has an active trail network, as it may become difficult to maintain as passable -Do not locate a new wilderness next to private property, if so have a buffer area set aside as a FS control area -Locate a new wilderness in a few people area, away from the public and let it sort out its future -Do not plan a new wilderness area for immediate viewing, you may be disappointed

Response: The criteria that you have outlined would be ideal, but just does not exist on the NFGT Criteria for selecting wilderness is very restrictive and prohibits certain activities and resource management There are few areas that might meet the criteria and location is not a criteria Criteria for wilderness evaluation is listed in App D

Issue: *3-2* *Wilderness Allocations*

Letter: 1167 To include the following areas and acres as located on the NF&Gs in Tx, as areas to be immediately ADDED as designated Wilderness Alabama Creek, Big Creek, Big Slough, Big Woods, Boggy Creek, Bounds Peninsula, Chambers Ferry, Four Notch, Graham Creek, Harmon Creek, Indian Mounds, Jordan Creek, Little Lake Creek, Longleaf Ridge, Stark Tract, Turkey Hill, Winters Bayou

Response: Big Slough, Graham Creek (renamed Upland Island), Indian Mounds, Little Lake Creek and Turkey Hill were designated wilderness in Oct of 1984 by Congress In that same legislation, Alabama Creek, Big Creek, Big Woods, Boggy Creek, Bounds Peninsula, Chambers Ferry, Four Notch, Harmon Creek, Stark Tract and Winters Bayou were returned to general forest status Big Creek was a scenic area and still is Chambers Ferry, or a portion thereof, and Winters Bayou were later designated scenic areas (Refer to App D)

Letter: 1388 We currently have wilderness areas set aside in our forests What would be wrong with expanding these wilderness areas and allowing a few black bears to live *there to be enjoyed by excited tourists?*

Response: The state of Texas has not decided to reintroduce bears since they were hunted out in the 20's & 30's

Letter: 1393 I would encourage you to preserve more wilderness area in the Texas NF In particular, I wish that you would recommend the Big Creek and expansions to *the Big Slough, Turkey Hill, and Little Lake Creek Wilderness area*

Letter: 1434 I favor the expansion of the Big Slough and Turkey Hill Wilderness areas

Letter: 1568 Recommend that the Big Creek and expansion to the Big Slough, Turkey Hill, and Little Big Creek areas be set aside as wildernesses

Letter: 1604 With every such area, add contiguous acreages where wooded, including an addition of at least 410 acres to Winters Bayou Scenic Area, 1128 acres to Big Slough Wilderness, and 1000 acres to Turkey Hill Wilderness

Letter· 1801 we also urge the FS to recommend additions to Big Slough, Turkey Hill and Little Lake Creek Wildernesses Wildernesses in the east are generally small and can provide greater benefits for backcountry recreation and wildlife if they are made larger

Response: Expansion of existing wilderness areas will have negative impacts on the RCW, a T&E species Expansion would also incorporate conflicts with wilderness by including roads, powerlines, oil wells and other inclusions, such as a cemetery in the case of Turkey Hill (refer to Wilderness Act and App D)

Letter: 1604 Recommendation Designate Big Creek Wilderness Area, 6767 acres

Letter: 1605 Designate Big Creek Wilderness Area, 6767 acres

Letter: 1723 Big Creek Scenic Area-- I support a larger scenic area but would prefer entire area be made into a wilderness There must be no horses allowed You need a standard that does not allow horses

Letter: 1801 recommend wilderness for Big Creek on the Sam Houston NF FS reports that Big Creek contains too many roads and that it is not free from *threatened and endangered species obligations The Eastern Wilderness Act recognized that areas can recover their wild character over time*

Response: Big Creek was not recommended for wilderness because it is very difficult to find any area, including Big Creek, on the NFGT of any size, that does not have roads, pipelines, utility lines, private land and outstanding or reserved mineral rights The management of the endangered RCW precludes wilderness management and most of the Sam Houston NF is managed for the RCW The existing 5 wilderness areas receive a relatively low amount of use, which is mostly hunting

Letter: 1723 (pg 102 DEIS) you state that wilderness areas in TX were established on May 20, 1987 by the Regional Forester This is untrue [Its] only Congress that [can] establish Wilderness Areas As your own maps for Wilderness Areas say, all five East Texas Wilderness Areas were established on October 30, 1984

Response: The statement on page 102 of the DEIS is incorrect It was supposed to indicate the "management" of wilderness was officially established by the signing of the FLRMP by the Regional Forester on May 20, 1987 This sentence will be removed or reworded to reflect the correct information

Issue: 3-2 Wilderness Allocations

Letter: 1723 (pg 106, DEIS) wilderness does not limit dispersed recreation unless this recreation depends on roads or mechanical means of accessing wilderness FS admits that primitive and semi-primitive recreation experiences are hard to find and there are few acres of these left Wilderness protects these shrinking and hard to find and once gone almost always gone acres. So the FS needs to increase the number of wilderness acres to make up for the dearth of acres where you can find solitude and quiet

Response: Additional wilderness will reduce and limit the options for dispersed recreation and wildlife management on those acres The fact that motorized or mechanical use would not be allowed, that vegetative manipulation would not be allowed, reduces the options for dispersed recreation and wildlife management, especially the RCW

Letter: 1633 Given the small size of many roadless areas, consideration should be given to whether they could be included into the existing five wilderness areas

Response They are not adjacent to existing wilderness and therefore could not be added to

Issue: 3-3 Wilderness Management

Letter· 6 I would like to have copies of the wilderness implementation schedule and the proceedings from the LAC planning task force regarding the Upland Island Wilderness I have a sincere interest in wilderness management

Letter: 991 We believe some form of prescribed burns for fuel reduction in wilderness areas is preferred over natural fires There is too much public safety and private property at risk

Letter: 1460 As for SPB infestations of wilderness areas, it should be noted that the FS managed these areas for "pine production" before they were designated wilderness areas Those even-aged single species methods PROMOTED future SPB activity

Letter: 1632 I commend the FS on the initiation of LAC work on the Angelina LAC's should be completed for the other wildernesses as well Equally important is that sufficient funding be available to implement LAC plans

Letter: 1633 Of the ten criterion for evaluating roadless areas for wilderness area designation, size of the area was not considered Of the 17 areas studied, only 5 would meet the size criterion of 5,000 acres in the Wilderness Act It is understood this numeric requirement was amended by the Eastern Wilderness Act However, it could be argued that, for example 1200 acres is not of sufficient size as to make practicable an areas preservation and use in an unimpaired condition

Letter: 1671 The Dept recommends that prescribed fire be implemented in wilderness areas It is also strongly recommended that the Regional Directive be amended to allow for SPB control within these areas SPB impacts have been dramatic and detrimental to both the wilderness areas and adjacent private lands

Response· Comment noted

Letter. 1614 On areas designated 'wilderness' the policy of benign management has failed I believe that any plan which offers successful and sustainable long term capabilities must harvest volumes approximately equal to growth in order to maintain good forest health To do otherwise invites disaster, both economic and environmental

Response: Wilderness is not designated to maintain economic values, quite the contrary Wilderness is designated to preserve natural areas in a pristine character, untrammeled by man, with only the forces of nature to act upon it

Letter: 1632 Fire management in wilderness is a polarizing issue Policy should be driven by ecological management concerns rather than fuel reduction Because of the divisive nature of the issue, the ultimate obligation of the FS is to retain areas of both successional and fire climax, with priority for management focusing on current conditions of pyric communities and the needs of carious vegetational types Natural lightning fires should be allowed to interact with the wilderness landscape to the greatest degree possible

Issue: 3-3 Wilderness Management

Response The FS agrees with this concept, however the 1964 Wilderness Act limits the use of fire to "control fire", which pertains primarily to prescribed burning for fuel reduction Natural fires will be allowed to burn if they are within prescribed parameters

Letter: 1310 The DEIS writer must have dispersed recreation mixed up with developed recreation when he or she wrote "Added wilderness on the Sam Houston NF would also further limit the amount of area available for dispersed use " What is wilderness use if not dispersed use? one more example of the DEIS's bias against wilderness.

Response· Additional wilderness will reduce and limit the options for dispersed use and wildlife management on those areas The fact that motorized or *mechanical use would not be allowed, that vegetative manipulation would not be allowed, reduces or limits the options for dispersed recreation and* wildlife, especially the RCW There are different levels of experience associated with dispersed use Primitive (wilderness) being the most restrictive and roaded natural having the most options

Letter. 1604 Third, the Wilderness Act requires that wildernesses shall be untrammeled by man The Draft EIS provides no research, documentation, or legal authority for trammeling wildernesses by prescribe burning Therefore, the Draft is inadequate to support current extra-draft movements toward prescribed burning in certain wildernesses

Letter: 1605 The Wilderness Act requires that wildernesses shall be untrammeled by man The Draft EIS provides no research, documentation, or legal authority for trammeling wildernesses by prescribed burning Therefore, the Draft is inadequate to support current extra-draft movements toward prescribed burning in certain wildernesses

Letter: 1605 The DEIS points out the absence of prescribed burning in wildernesses since 1984 (actually 1978 under RARE II) and admits that wildfires there *have been "insignificant", yet fails to grapple with this indication that the planned 3-5 year prescribed burn frequency in MA1 and MA2 is far more* frequent than in nature.

Response: Fire is a natural part of most East Texas ecosystems. Fire has substantially been eliminated from Texas wilderness by the aggressive action taken to put out all wildfires The high fire danger, gradual change of the wilderness ecosystem and the unnatural heavy vegetative growth all caused by the lack of fire in the ecosystem is in need of either prescribed natural fire or prescribed burning to emulate natural fire. Many of the bogs, sensitive plants, longleaf and East Texas ecosystems are fire dependent Prescribed burning in wilderness is permitted in the 1964 Wilderness Act through the control of fire in reducing fuel loading

Letter: 1605 *Since most people using hiking trails and wilderness areas are seeking solitude as part of their forest experience, noise levels need to be contained* around these areas This quality cannot be obtained in other parts of the forest (e g developed campgrounds)

Response: Because of the size of the wilderness areas in Texas and the fact that they are all bordered by roads and, in fact have roads through 2 wilderness areas, and adjacent private property, there is no way to control sound levels from these sources

Letter: 1605 Recommend Bridges should not be built in wilderness

Response There are no plans to construct either trails or trail bridges in wilderness The trails and trail bridges that exist within NFGT wilderness areas existed prior to wilderness designation

Letter: 1605 *Everything possible must be done to preserve the integrity of these wilderness areas*

Response: *NFGT* wilderness will be managed in accordance with the *NF* Wilderness Act of *1964*, Eastern Wilderness Act of *1975* and Texas Wilderness Act of *1984*

Letter: 1609 Angelina County already has a wilderness area, Upland Island, near Zavalla This wilderness area could be expanded with campgrounds and trails added to make a beautiful area that people would visit These visitors would spend money that would benefit the local economy

Response. It would be illegal to build campgrounds inside wilderness There are already campgrounds in close proximity to Upland Island Wilderness, which are Caney Creek, Sandy Creek, Bouton Lake and Boykin Springs Recreation Areas

Issue: 3-3 Wilderness Management

Letter: 1723 Horses should not be allowed in wilderness areas

Response: Horses are an accepted primitive, non-motorized, non-mechanical means of transportation in wilderness Present use of horses in NFGT wilderness is very low If a wilderness began receiving over use by horses, then limitations would be established to stop resource damage

Letter: 1723 I want the FS to discuss and propose that some portion of each wilderness area will be off limits to hunting so that other activities can occur This issue is not addressed in this document

Response: With the apparent low use and the policy that hunting in wilderness is a legitimate use (almost the only use), there appears no need to discuss that, until use increases to the point that creates conflicts with other users

Letter: 1723 (pg 104 DEIS) the subject of mineral rights that are not owned by the government but are in wilderness areas is broached I want the FS to discuss the option of buying all such mineral rights, the cost, the number of acres for each wilderness, the types of mineral rights that are outstanding, and have an alternative that buys out these mineral rights You do not give a full analysis of this issue

Response It is possible to purchase mineral rights under wilderness, however, until such time that Congress decides to do that, the FS has neither the time nor the money to do it With today's technology, it is possible that drilling could take place off site in some cases

Letter: 1723 The FS also does not detail how carrying capacity of 2 RVDs/acre was determined Any standard that is used must be fully explained along with how it was derived so that the public will understand and can comment on the appropriateness of the standard The concern apparently is that wilderness is not getting sufficient use if the qualities of solitude and quiet and other wilderness values are to be maintained perhaps it is good that the carrying capacity has not been reached

Response: 2 RVDs/acre is a figure established for primitive areas for maximum amount of use allowable and still maintain the primitive attributes It was intended as a planning and management guide The wilderness areas are considered primitive Use levels for the different experience levels were established through research by the Pacific Northwest Forest and Range Experiment Station by Roger N Clark and George H Stankey Report dated Dec 1979

Letter: 1723 (pg 197, DEIS) There needs to be a wilderness ranger for each wilderness and a dedicated law enforcement presence to deter purposeful and nonpurposeful violations

Response: Given sufficient funds, this might be accomplished

Letter: 1801 wilderness management and endangered species obligations, such as for the RCW, are compatible The classic treatise, "Wilderness Management" by Hendee, Stankey and Lucas (1990), makes clear that activities that would not normally be allowed in wilderness, such as vegetative manipulation, can be carried out in order to conform to the requirements of the ESA

Response. RCW management would require vegetative manipulation (thinning), and the wilderness act does not allow for vegetative manipulation for wildlife Hendee (1986) also stated that "certainly most of the wilderness areas in the east are too small to contain the ranges of many wilderness species Can adjacent habitat be managed in such cases, " Which is the case in NFGT wilderness areas RCW colonies in wilderness may however be protected from SPB by cutting infested and buffer trees

Letter: 1433 Cutting and removing timber from wilderness should not be allowed

Response. Present wilderness and SPB in wilderness management allows cutting of timber within 1/4 mile of wilderness boundary to stop the spread of SPB to private timber land or other high value timber land Timber that is cut is not removed

Letter: 1435 Do not allow cuts in wilderness areas even if the beetles threaten private land Let the land owner take precautions on his land at his expense Nor should you cut in SMZ's or in hiking trail buffer zones

Issue 3-3 Wilderness Management

Response: The Wilderness Act allows for the control of insect and disease in wilderness No action by the FS to control the spread of SPB in wilderness could make the government liable for any damages to private property

Letter: 1723 I favor the use of fire to reestablish LL pine and bog communities as spelled out by the Upland Island and Turkey Hill Wilderness Area LAC Task Forces

Response· The revised plan incorporates language from the LAC that will allow development of an EA for each wilderness

Letter· 1723 (pgs 137-148) these S&Gs do not fully reflect what the LAC documents mentioned above come up with You must incorporate all the LAC recommendations as S&Gs for wilderness areas until such time as a specific LAC has been done for each wilderness

Response: The LAC document is not a decision document, it is information from which the manager may make decisions Recommendations are not standards, but they might possibly be adopted later

Issue: 3-4 Wild and Scenic Rivers

Letter: 103 including additional scenic river status of the Neches
Letter: 1600 The proposal to name the Neches River as a Scenic River is not necessary. The FS's Streamside Management Zone Standards offer adequate protection
Letter 1605 MA-8b-03 - Revegetation with non-native species should be used and justified on a case basis only, and only when no reasonable native alt is available When non-native species are employed, a clear schedule for restoring native plant communities must be developed prior to the use of the non-natives
Letter 1605 General - In keeping with the goal of not disturbing the serenity of the area, limit the horsepower and decibel levels of motorboats permitted within *W&S River Corridors, as well as in other Special Areas*
Letter: 1630 I urge designation of Neches River as Federal Wild & Scenic River - NFS should actively support'
Letter: 1723 (pg 110, DEIS) disagree with the statement "In general, corridors for these potential Wild and Scenic Rivers are managed for the protection of their special attributes in all alternatives" Alt 1 allows cutting for SPB in the river corridors
Letter. 1723 (MA-8b-23) I am against the construction of any campgrounds, in such a corridor
Letter: 1723 (MA-8b-71) support no grazing in river corridors
Letter· 1723 (MA-8b) No greentree reservoirs
Letter· 1723 (MA-8b) Nothing less than protecting the (W&S river) corridor will do Activities that will harm the values that were used for criteria must not be allowed in the corridor
Letter: 1723 (MA-8b) Absolutely no cutting must be allowed
Letter 1733 Private property consequences of Wild and Scenic Rivers I feel there will be greater retention(?) for damage and the resultant conflict with private landowners and USDA-USFS culminating in Federal litigation and remedy
Letter: 1808 App E, Wild and Scenic Rivers, p. 2 In order that inherent values may be protected and managed, we support designation of the two segments of the Neches River, identified in the DEIS as a National Wild and Scenic River to be included in the National Wild and Scenic River System of Waterways

Response: Comment noted

Letter· 1723 (MA-8b) . you do not have several rivers that must be protected Ayish Bayou Angelina River Attoyac Bayou Neches River Winters Bayou East *Fork of San Jacinto West Fork of San Jacinto Caney Creek (SHNF)*

Response: See FEIS Appendix E for W&S overview process & recommendations

Issue: 3-4 Wild and Scenic Rivers

Letter: 1723 plan (MA-8b) .says nothing about the importance of working with other landowners to protect the (W&S candidates) rivers being discussed and how the FS will accomplish this There must be S&Gs that address this

Response: USFS responsibility is protection & mgmt of corridor until state initiated suitability study is completed As lead agency, state would identify & promote stewardship of the corridor, including landowner cooperation

Letter. 1723 (MA-8b) what does "somewhat undeveloped and relatively undeveloped shoreline" mean? What will be allowed?

Response: Certain development that conforms to scenic & recreational emphasis would be promoted

Letter: 1723 (MA-8b-131) gives the FS a loophole to cut in the river corridor

Response: Std provides opportunity to enhance W&S values including scenery & recreation through mgmt

Issue: 3-5 General

Letter: 1662 Designate as special areas all those sites on pages 111, 114-116 of the DIES not already under a protective designation
Letter. 1664 I live on land joining the Winter's Bayou Scenic Area and I would like to see this area preserved as wilderness
Letter: 1723 (pg 112 DEIS) I also favor parts of Nebletts Creek and Big Woods being set aside as a special management area
Letter. 1723 you say on page 113 that impacts on commodities is proportional to the amount of acreage that is removed Since the acreage is not a significant amount the impacts on commodity production are not significant
Letter 1801 The FS should recommend some select areas for wilderness and other legislative protection, It should also afford administrative protection for all roadless areas and candidate special areas

Response: Comment noted

Letter: 1605 With every such area, add contiguous acreages including an addition of at least 410 acres to Winters Bayou Scenic Area, 1128 acres to Big Slough Wilderness, and 1000 acres to Turkey Hill Wilderness, and 691 acres to Little Lake Creek Wilderness
Letter. 1662 Add contiguous acres (where wooded) to areas under protective designation, including without limitation the addition of at least 410 acres to Winters Bayou Scenic Area, 1128 acres to Big Slough Wilderness, and 1000 acres to Turkey Hill Wilderness

Response Expansion of existing wilderness areas will have negative impacts on the RCW, a T&E species Expansion would also incorporate conflicts with wilderness by including roads, powerlines, oil wells and other inclusions, such as a cemetery in the case of Turkey Hill (refer to Wilderness Act and App D)

Letter: 1723 (pg 254 DEIS) a roadless area under the Wilderness Act does not have to be 5,000 acres or more in size

Response: In the 1964 Wilderness Act, 5000 acres or more was an evaluation criteria The Wilderness Act of 1975 "Eastern Wilderness Act", the 5000 acre limit was removed

Letter: 1723 (pg 111 DEIS) you talk about reducing the economics by RNA designation but you do not talk about the economic benefits of you are showing economic bias here

Issue: 3-5 General

Response: What are the economic benefits of RNA designation? We can find no information that would indicate an economic benefit

Letter. 1604 For special areas there are no maps or descriptions (except for sketchy ones as to Scenic rivers, and some unnamed dot clusters on some maps in the "Map Package " There is only one full list of special areas That list indicates which alternatives recommend which, if any designation each special area might receive, but even there, it fails to show which area will be botanical, scenic, or ecological, or how many acres it might contain

Response: *The IDT agrees The final revised Plan has been amended to reflect this*

Letter· 1605 Designate as special areas all those listed on pages 111, 114-116 of EIS except Areas designated under (RNAs and Longleaf Ridge) and Five wildernesses areas listed in the DEIS as "riparian" should be made special areas, for better protection

Response: The term "riparian" has been deleted from the final revised plan Areas classified as riparian/wildlife special areas in the draft are now clarified as bottomland areas There has been no change in the DFC for the areas The DFC, together with the S&G's will determine the mgmt practices

Letter. 1723 on Table 3 what you would propose is not significant as far as land set aside and

Issue: 4 OFF-ROAD VEHICLES (ORV'S)

Issue: 4-1 ORV use

Letter: 332 I think ORV's should be restricted to a very small part of public lands Their G-- D-- noise has ruined more than one weekend for me
Letter: 1461 The ORV (and also ATV) abusers do not restrict their abuse only to Angelina NF pine farms, they also create numerous trails all through what tiny fragments are left of second growth mixed forest habitat, plus the pine farms in Davy Crockett NF
Letter: 1461 The ORV (and ATV) abusers' attitude that just because someone else can rip up the wildlife habitat, then they are entitled to rip it up too, is sadly true of the attitude of many people toward wildlife habitat
Letter. 1461 to use ORV's in forest land allows many sly poachers to use small, easily concealed ORV's that usually do not betray their presence to humans or animals Numerous ORV (and ATV) trails laced all through a forest does facilitate poaching
Letter: 1461 ORV (and ATV) abusers have free access to FS land 365 days a year, 24 hours a day That includes hunters who use ORV's (or ATVs) in the hunting season, thus making the abuse year round
Letter. 1723 .there must be no use of ORVs in the (MA-8b) corridor do not approve of motor boating unless with some horsepower limit to reduce noise horses should not be used in floodplains
Letter: 1723 The grasslands are too small to allow any ORV use and should be banned from having any such use except on FS system roads
Letter· 1723 (MA-9a-112) I am opposed to any ORV use in developed recreation areas unless it is for driving on the road
Letter: 1723 (MA-8c-93) I agree (no ORVs)
Letter: 1723 I also support MA-8b-85, no ORV use in the area
Letter· 1723 ATV's must be removed from Catahoula Barrens and let Nature regenerate the area and do not try to plant pines
Letter: 1723 I favor (MA-8a) 93 to stop ORV use
Letter: 1767 *ORV's have created a problem in the past and I am opposed to opening the USFS land to more use People come off USFS* land on to private property, cutting fences, trespassing, hunting illegally and disturbing livestock It has created a burden on the Sheriff's Dept and private land owners causing ill feelings towards the USFS Livestock that escape on to USFS land, being no fault of the private landowners, have been gathered by the USFS people, and owners being fined and/or livestock being sold at public auction

Issue: 4-1 ORV use

Response: Comment noted

Letter: 55 The NF should be closed to ORV's - they're much too disruptive and noisy
Letter. 1400 People enjoy and value the forest for its beauty and tranquility listening to ORV'S roaring around is anything but tranquil

Response: ORVs have been identified as a legitimate use of our NF Our intention is to manage them to minimize impacts as well as noise There are maximum noise regulations which are sometimes difficult to enforce 100%

Letter· 298 I really don't think ORV's were intended as a use of the NF system when it was designed, and they serve neither a commercial purpose nor a recreational purpose that is compatible with forest plant and animal life
Letter: 1124 ORV use should be drastically decreased It's damage to the ecosystem is well documented and is to the expense of everybody else
Letter: 1433 ORV's should not be allowed in the Forest
Letter: 1453 I urge no ORV use on or off NFGT trails
Letter. 1460 Based on my observation of soil and root damage along ORV trails, I do not consider ORV use compatible with any aspect of forest management ORV use should be discontinued throughout the NF of Texas
Letter 1723 (plan pg 112) - the FS is under no obligation to provide recreational opportunities for ORVers must show use will not cause harm to resources, and is compatible and will conflict with other use
Letter 1723 FW-152 - no ATV use should be allowed at all

Response: ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter 1252 limit ORV access
Letter. 1263 Please help limit ORV use
Letter: 1281 ORV's should only be allowed with a special-use permit, and then, only if their use can be justified

Response: Implementation of an ORV permit may be considered in the future. Hopefully, the implementation of such a permit would allow fees collected to go to maintenance and management of ORV trails

Letter: 1467 I am writing to you in response to the USFS's plan to restrict or prohibit the use of ORV's in our Angelina & Sabine NFs

Response. The FP does not prohibit ORV use on the Angelina or Sabine NF The Plan does try to establish management direction to minimize resource damage to soil, water, vegetation and wildlife

Letter· 1511 I object to the proposed closing of the Angelina NF to ATV units My home is in the area of sections 61/62 (Angelina NF) Being handicapped to some extent forces me to use an ATV to wander through the areas you are considering closing, you would take away my pleasure of watching the birds, deer, and other wildlife
Letter 1574 I am writing this letter to protest the plan to close most of the southern Angelina NF to ORV use We as disabled individuals and senior citizen do not have many rights now Please do not take those away from us
Letter 1578 Over the years I have watched loggers destroy these woods, leaving behind fallen trees as well as destroying smaller hardwood trees the trucks leave behind oil and hydraulic spills as well as their containers and bottles which has gone unnoticed by everyone Yet we chose to eliminate riding of ATV's in the forest by families that appreciate this freedom It would take many years to do the damage that is done in a matter of days by loggers
Letter: 1584 I have been riding in the NF for over 15 yrs and would like to continue to do so

Issue 4-1 ORV use

Response *The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage*

Letter: 1550 There are many, many places they (ORV's) can operate Pipe line easements, powerline easements and back country roads They don't need the NF

Response: Pipelines and all utility ROWs are closed to ORV use

Letter: 1627 ORV's create a nuisance in the forest not only to other people but also to plants and animals Excessive vandalism of the soil and other resources by the riders of those vehicles should not be tolerated and should certainly not be encouraged I suggest that no forest be totally open to the use of ORV's In areas that are open to ORV's their use should be restricted to permanent trails only

Response It is the intent of the FP to limit use on the Angelina and Sam Houston NF to designated trails and have very little, if any, open areas on those 2 *forests Use on the Sabine and Davy Crockett is small and not planned, as yet, to limit to designated trails*

Letter: 1723 (pg 22 Summary) you try to minimize the impacts of ORV use by saying "Uncontrolled ORV use may have an adverse impact to soil and water values" The reality is both uncontrolled and controlled ORV use have had and are having adverse impacts on soil and water in Texas NF This is not supposition but proven fact So quit trying to minimize and hide this fact

Response: Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Letter: *1656 I am writing in regards to the proposal to ban the use of recreational vehicles on NF land It is my understanding that the NF was established to* protect the land and forest It is obvious that more and more restrictions are being made to prevent the use of the land by the public

Letter: 1657 I cherish my memories of hiking, camping, dirt-biking, & 4-wheeling in the Angelina NF I learned valuable lessons about wildlife itself, but also I matured by taking on the responsibility of paying for & maintaining dirt-bikes & ATV's I enjoy taking my nephews and other youngsters up to Boykin Springs Rec area to relay the same valuable lessons on to the next generation That is why access to our NFs is imperative to keep maintained for all to continue using and enjoying for years to come

Response: An ever increasing population, demanding more and more has generated more and more environmental laws and regulations to protect the resources from the increased use and environmental concerns Restrictions are implemented only to protect the resources and other users

Letter: 1723 (pg 194&195 DEIS) You even admit that the grasslands are not good for ORV use because they are very fragmented, use would become concentrated, and *potential conflicts with other users, private land owners and resource damage would be high, and that the grasslands are relatively small* Yet you still propose ORV use on the grasslands

Response: We agree This issue has been reconsidered and ORVs will be prohibited off open system roads Only licensed vehicles and operators are allowed on system roads

Letter· 1723 (pg 194 DEIS) In my view ATV's should be banned from National Forests

Response· ORVs have been identified as a legitimate use of the NF Our job is to manage to minimize impacts to the resources

Letter: 1723 (pg 46 DEIS) You again say that ORV use is prohibited in Alt 6 but on page 26 you say otherwise

Response: Page 46 of the DEIS is correct, statement on page 26 will be corrected to correspond to that

Letter· 1723 (pg 10 Plan) It is not potential impacts that have led to more constraints being put on ORV use but actual impacts You must not minimize this problem

Issue: 4-1 ORV use

Response: Potential impacts from continued "uncontrolled" use Providing designated trails and concentrating management on these trails and closing open, uncontrolled use is the proposed direction

Letter 115 If one rides through an area where logging is or has been done, the damage is more than devastating--it's horrible It is thousands of times worse than ORV's could do over decades of riding

Letter: 1734 In preparing EA and EIS the historic use of the land should be considered more How could ORV's damage the land more than logging?

Letter: 1766 As long as loggers are permitted to use skidders and logging trucks on roads, trails, and roads they devise, this cannot be less erosive than ATV use If ATV's are not permitted in the NF, that the American Sportsman have helped pay for through the taxes on sporting goods, rifles, ammunition, etc , the loggers and logging operations should not be permitted either . I fail to see how a 200-400 pound vehicle causes as much damage and erosion, or harm to the forest than a 90,000 pound logging truck or a skidder does.

Response: S&G for timber harvest activities and ORV management are in place that would ensure resource protection and/or mitigation Only in cases where these S&G have not been properly implemented, would unacceptable resource damage occur

Letter: 1772 I recently learned of the law to ban ATV's in the NF I am very disturbed about this

Response: We are not aware of any law that is banning ATVs from the NF

Letter: 1802 The DLRMP acknowledges OHV recreation and assumes some responsibility to provide for some recreation opportunity However, the document makes too many assumptions without corresponding facts, and reaches mgt decisions based on these assumptions (Plan-II-10) you state "Without a designated trail system, ORV use is prone to conflict with other recreational activities and can lead to resource damage " Nowhere in the DEIS is this statement quantified In the Angelina NF where open riding is enjoyed, what percent of the land base is affected by this trail use? How many on-the-ground incidents of conflict have been documented?

Response: Unfortunately, we do not have good resource monitoring of ORV trails Visually, we have many areas that appear to have severe erosion and compaction There are several areas that are in conflict with wildlife (i e RCW and other users) The Sawmill Hiking Trail has been badly damaged by ORV use ORVs have and continue to get into closed areas

Letter. 1600 The FS has tried for years to ban ORV use through different federal and state laws, ie the Endangered Species Act, the Antiquities Act and now the Clean Water Act What is next, imagined violations of the Clean Air Act? No mention is made in the Plan for trail head improvements ORV riders have long suffered totally inadequate parking and camping facilities at the Sexton Pond trail head What provisions are planned for the limited number of disabled ATV riders currently using the southern Angelina Will the FS be in compliance with the Americans with Disabilities Act in providing these citizens with their chosen recreational activity. The issues of soil compaction and vegetation damage as they relate to ORV use are a very minor issue ORV riders stay on the established trails To do otherwise is to court disaster. You are duty bound to provide tax paying citizens as much open use land as needed for ORV riding opportunities

Letter: 1646 we are against the plan to close most of the Angelina NF to ATV riders

Letter. 1653 Please consider my request to NOT ban the use of ATV's in the NFs of Texas, expecially Angelina N F I, along with my wife and two sons ,will get on our 4-wheeler and ride in the woods I implore you to not take the right to continue doing this away from us! My two granddaughters are elated when they get to go to the camp and ride the 4-wheeler with their Paw-Paw

Response The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Letter. 1723 MA-8f-75 - I agree

Response: The IDT appreciates your support

Letter: 1802 FW-150 Delete the phrase, "alerting drivers to difficulty levels " Difficulty is subjective, and in general we resist the rating of trails

Issue: 4-1 ORV use

Response: There are different experience levels of users The NF trails are managed for all users What you may not need or desire, other users may

Issue: 4-2 ORV Management

Letter: 109 Better control of ORV use to reduce impact on wildlife and vegetation and stream quality is needed
Letter: 1310 Specific, measurable monitoring criteria must be developed for ORV impact on the forest
Letter: 1736 None of the motorcyclists who use the forest want to see this public property destroyed by poor management and over use But with such a large area it is very frustrating to be limited to such a tiny distance
Letter: 1767 As far as restricting use to trails, this has not worked in the past and will not work in the future They get off designated trails and create erosion and destroy young trees This has created a burden on our local law enforcement in the past having to investigate trespassing USFS law enforcement is greatly under manned now Under A-1 we would like to see the budget and personnel doubled to prevent poaching and protect our turkeys which are largely on USFS land If more ORV use is permitted the budget and personnel should quadruple

Response: Comment noted

Letter. 1605 ORV noise should be strictly controlled & monitored and kept to a minimal level

Response: ORVs have been identified as a legitimate use of our NF Our intention is to manage them to minimize impacts as well as noise There are maximum *noise regulations which are sometimes difficult to enforce 100%*

Letter: 1632 ORV use is a consumptive resource that is not adequately regulated to prevent long-term declines in affected resources ORV impacts must be dramatically curtailed ORVs should be restricted to designated trails only on all Forests Designated trails per forest should not exceed 20 miles

Response: ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter: 1389 We are writing to protest the plan to close most of the Angelina NF to ATV users
Letter: 1391 I am writing to oppose your plan to close the southern Angelina NF to ORV use

Response: *The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage*

Letter: 1380 I am an old time hunter and still hunt 100-200 hrs per year I request that the use of all motorized ATV - motorcycles etc be banded from the Public Forest

Response. ORVs have been identified as a legitimate use of the NF Our job is to manage to minimize impacts to the resources

Letter: 1675 . in thirty plus years I have seen ATV travel in our forest, they have not done half the damage I have seen one ten ton skidder do in one week - and will be glad to show you or anyone, anytime But I suppose since that is done in the name of economy (money) instead of the pure enjoyment of the forest it is supposed to be okay

Response· S&G for timber harvest activities and ORV management are in place that would ensure resource protection and/or mitigation Only in cases where these S&G have not been properly implemented, would unacceptable resource damage occur

Issue 4-2 ORV Management

Letter. 1769 heavy use upon their motorized recreation amenities If the plan to close the current open riding area prior to developing designated replacement trails is followed, this use will be diverted onto the currently designated trails The diversion will result in higher use upon the designated trails At some point, these trails may receive overuse if designation and development of trails replacing the open area lages Much of the designated trail system is maintained through volunteer agreement The volunteers may not be able to keep up with the resultant increased maintenance needs

Response: This is true A large portion of the proposed trail system should be in place prior to closure of the open area

Letter. 94 In some states there is a fee (and sticker) specifically for OHV's and ORV's We would gladly pay a fee to help offset the cost of a good trail

Letter: 1389 All ATV riders are required to have a Texas Department of Public Safety Certificate and must pay a yearly $12 00 fee for a sticker before thay can legally ride on public lands Why doesn't the FS require the same?

Letter: 1507 One innovative approach that should be considered is the implementation of an ORV "fee" system for using the forest to offset the cost of managing a trail system

Response· An ORV permit sticker is something that has been discussed Until such time that all the money collected can be kept on the forest and used directly for trail management, it probably won't be implemented

Letter. 1394 I encourage you to take a more moderate approach both to ORV use , rather than the extreme environmentalist approach that you are taking

Response: We are taking a resource protection and management approach, probably something we failed to do in the past

Letter: 1507 Until specific concerns are identified and addressed no section of the forest should be closed to ORV use

Response Some of the concerns have been identified and the FP is addressing those concerns

Letter 1723 FW-145 - allows open use areas when the FS says that use of such area is prone to cause resource damage and user conflicts (see pg 10 plan)

Response That's true We have identified the problem, more monitoring and evaluation of the problem is needed in order to formulate possible solutions

Letter 1629 I would like to express my concern about the proposed Forest Use Plan Many of the alternatives would seriously restrict or completely stop off road motorcycle (ORV) use in the Angelina NF, around Boykin Springs

Letter 1773 I am writing to protest the plan to close most of the Angelina NF to all ATV users I am unable to walk great distances and therefore depend greatly upon my ATV to get around (Black Forest Community)

Response· The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Letter: 1635 Consider the following for ORV use in the Angelina NF 1) Use the existing multiuse trail system There is approx 150 miles of trails 2) Permanently mark and map the existing trail system 3) Re-route, modify or close any section of trail that is causing an environmental problem 4) Minimize stream crossings by re-routing existing trails 5) Provide new riders with trail location maps & rules 6) Request input from organizations that are using the trail system 7) Club involvement will provide a source of free labor to reduce cost 8) Set up committees of USFS personnel and club members to meet periodically and monitor the trail system

Response: What you have proposed is very good I believe that we have made changes in the plan that reflect most, if not all, of what you propose The total trail mileage may differ from the 150 miles you mentioned

Letter: 1723 FW-151 - There must be no ORV use unless the area is signed for ORV use You also need to define what traffic area is

Issue 4-2 ORV Management

Response: Areas & trails will be signed for use allowing ORVs Webster defines traffic area as "the movement of pedestrians or vehicles through an area or along a route"

Letter: 1723 *(pg 95 plan) motorized trails are not condusive or complimentary or compatible with RCW expansion and existence and yet you allow 255 miles of them to* exist in SHNF Why?

Response: The RCW EIS allows ORV trails to remain in existence & use when the birds choose to move next to them So far, there doesn't seem to be any problems *with existing trails New trails will not be placed in or adjacent to colonies*

Letter: 1723 MA-4-85 - since forest-wide S&G's are inadequate to stop resource degradation how can you allow crossings at streamside zones? You have not addressed how long-term channel changes will be prevented by this plan

Response: The IDT disagrees, S&Gs provide numerous protection measures to ensure the integrity of stream channels

Letter: 1723 MA-4-107 & 108 - these should be changed to use of bridges only By limiting bridge use you ensure that more soil erosion and hardening and thus urbanizing of the forest will continue

Letter: 1723 MA-4-109 - should be eliminated because it ensures that less than the best mitigation (fords as opposed to bridges) for crossing streams is allowed

Response: MA-4 has been changed to reflect your concerns, however, options for fords or bridges must consider many site specific factions

Issue 4-3 ORV trails in the Forest

Letter: 387 the ORV trails should be increased but eliminate free cruising everywhere by ORV's, horses, etc

Letter: 492 the aims and desires of the citizens have been buried under the odd notion that degradation of the trails by ORV's are what the majority of Texans want

Letter. 604 the trails at Sam Houston NF are very narrow and contain an abundance of tree roots and stumps

Letter: 615 I also feel that if more trails are established, it will ease the use

Letter. 650 I urge you to allow these trails to remain open to vehicular traffic

Letter: 1236 ORV trails - the FS preferred alt has 355 miles of ORV trails

Letter: 1310 I believe that a maximum of 75 miles of ORV trails for the NFT is the most that can be properly maintained, monitored, and mitigated And where monitoring shows unacceptable damage, trails must be closed

Letter: 1409 More trails are needed for ORVs in the Raven District,

Letter: 1431 I have personal experience with the gullying and erosion produced by ORV's I have traversed nearly impenetrable briar patches because the "trail" was too deeply rutted by ORV's to be passable on foot

Letter: 1458 The clean Water Act should create no problems (re ORV trails) In most riding areas of the US, small 24" wide bridges are constructed by local clubs over the stream bed crossings In some cases, stream beds are "hardened" by the use of special concrete blocks Also, the number of stream crossings can be minimized with proper trail layout and design

Letter: 1461 Probably the FS does not want the increasingly numerous ORV trails on their pine farms because they prevent regeneration of considerable numbers of pine seedlings, which to them translates into MBF of timber resource

Letter: 1467 It has been suggested that vegetation might be damaged or destroyed in areas of concentrated ORV use ORV's require a trail width of approx 36 to 48", no more ORV riders DO NOT indiscriminantly ride through the forest

Letter: 1627 I am opposed to a large increase in the mileage of trails for ORV's The increase in alt 2 is sufficient

Letter: 1628 I feel very strongly that a priority be placed on designating the new trail as soon as possible It appears that the FS has been remiss in any priority on this matter I have noted that the last time any new trail was 1987, the last time Land Management Plan was effected

Letter: 1633 ORV use should be permitted only on designated trails

Issue: 4-3 ORV trails in the Forest

Letter: 1654 access to the wonders of the NF has been one of the main recreational activities of my family I have four childres (ages 18, 15, 8, and 5), numerous friends of the family and extended family members that have enjoyed the NF We do this by riding our motor cycles through the forest on the trails established by the Trail Riders of Houston and on trails established by hunters and on the old fire break along the perimeter of the forest My family maintains approximately ten miles of these ancillary trails that are not part of the Trail Riders of Houston trails, I have seen many deer stands established over the years along the trails that I have maintained So, I know that I am doing a service to countless others who use "my" trails to access the forest for hunting and other recreational activities

Letter: 1657 have a designated set of usable trails for all to use and enjoy in years to come

Letter: 1734 The Sam Houston NF has a very high ORV "user day" occurrence in a too confined area The less than 50 miles of permanently marked trail (PMT) is being "worn-out" because of current District management. The FS District office is limiting all organized events to be on PMT only If organized event permits were also issued for the open riding area the high user concentration on PMT could be diluted

Letter 1763 proposed changes in management of ORVs would also enhance the protection of many plant and wildlife species and stream quality detrimental impacts to the flora, fauna, soils, and water quality could be minimized by instead establishing a system of trails

Letter: 1802 FW-138 Please change to "Trail Planning, design, construction, and maintenance will be guided by the USFS Trails Handbook and/or the Trails South Guide " The USFS Trails Handbook offers excellent advice, is being constantly improved upon, and is intended for guidance only The NFGT should not lock itself into mandating conformance to this document

Response. Comment noted

Letter. 1127 New ORV trails should be avoided until a plan is produced that justifies ORV trails in the context of sustainable development of the forest regions

Letter: 1808 We recommend a reduction in the number of ORV trails by at least half the proposed amount, and that a study of the impacts of ORV use on the RCW be conducted

Response: ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter: 1507 ORV's have used a network of several hundred miles of trails in the southern Angelina NF for decades To close this forest to a legitimate user without supporting studies would be a capricious and arbitrary act which would not stand a judicial test

Response: The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage

Letter: 1605 ORV use should be limited to use on designated trails only

Letter: 1608 Restrict ORV use to only designated trails and stabilize current trails (stop erosion and gullying) before any new trails are built

Response: It is the intent of the FP to limit use on the Angelina and Sam Houston NF to designated trails and have very little, if any, open areas on those 2 forests Use on the Sabine and Davy Crockett is small and not planned, as yet, to limit to designated trails

Letter: 1130 My sons want to be able to drive the same trails one day

Letter. 1774 ORV's should be restricted to trail use, and trails maintained before mileage is increased

Response. Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Letter: 1237 Since our East Texas forests are alrady decimated by pipelines, powerlines & roads - please place no more for ORV & equestrian trails than roads & paths are available to them already

Issue: 4-3 ORV trails in the Forest

Response: An ever increasing population, demanding more and more has generated more and more environmental laws and regulations to protect the resources from the increased use and environmental concerns Restrictions are implemented only to protect the resources and other users

Letter: 1765 No additional ORV trails should be built or permitted

Response: ORVs have been identified as a legitimate use of the NF Our job is to manage to minimize impacts to the resources

Letter: 230 The draft calls for 250 miles of new off-road vehicle trails with no measures to stop erosion, gullying, stream sedimentation, or conflict with other users by present or future trails Half of the forest is open to unregulated cross-country ORV use

Letter: 1654 I have observed with horror many times the impact of clear cutting of the forest At times my trails and beautiful plots of the forest have been totally destroyed Before any consideration should be given to elimination ORV trails and use I believe that clearcutting should be eliminated The trails and their riders do very little environmental impact where as clearcutting destroys it!

Letter: 1656 reported concern is land erosion and the destruction of plant life, I have witnessed land erosion and destruction of plant life during my rides, however, they were not the result of recreational vehicles. They were the result of logging operations Loggers can cause more damage in one day on NF land than recreational vehicles could in a whole year If the logging operations are banned from our NF land, I would be happy to stop driving my 3-wheeler on this land Otherwise, it is totally ridiculous to ban recreational vehicles

Response: *S&G for timber harvest activities and ORV management are in place that would ensure resource protection and/or mitigation Only in cases where these* S&G have not been properly implemented, would unacceptable resource damage occur

Letter: 1602 I would like to state my feelings concerning the proposals the FS is developing for use of the land First, we would definitely like to see more designated trails developed for ORV use Secondly, I would not be opposed to restricting certain areas to ORV uses, but only after the proposed 200 miles of additional trails have been developed

Letter. 1637 The FS had a proposed 85 mi riding area that was never designated and now in a new plan you are proposing 250 mi of riding trails, but when will they be designated

Letter: 1747 Please develop the proposed trails as soon as possible as I feel crowded in the existing riding areas

Response: This is true A large portion of the proposed trail system should be in place prior to closure of the open area

Letter: 1734 the limited existing PMT must be expanded, the proposed 250 miles in the Sam Houston alone is an acceptable number This will help dissipate the user population . The Sam Houston PMT is not contiguous, Lake Conroe splits it into two small loops A concerted effort should be made to connect the PMT on the north end of Lake Conroe There is an existing trail that has been used on enduros for the last twenty-seven (27) years that would do this It is imperative that the trails be contiguous, and that no existing historically used area be closed before all 250 miles are complete

Letter. 1777 I live in N Houston and ride motorcycles in the Sam Houston NF It is one of the few places left to ride in all of the Houston area I would like to see it stay open!

Response: There should be a sufficient amount of trail mileage to safely ride on the Sam Houston NF prior to closure of open areas

Letter: 888 The solution is to go ahead and enlarge the existing designated trail system to the planned 250 miles My suggestion is to begin this expansion in the currently designated Open Riding Area and ultimately connect the trails on the East and West sides of Lake Conroe by an O R V - Bicycle lane on the bridge at Stubblefield Lake Campground

Response That is approximately what we propose except all the trail system will have to be evaluated for resource protection and possible relocation and constructed to a set standard

Letter: 1308 I believe ORV use needs to be regulated to prevent damage to the forest The drastic increases in ORV trail miles as proposed in Alternative 3, 4, 4a and 4b will be expensive to build and maintain and will provide increased forest access resulting in more opportunities for ORV users to leave designated ORV trails and explore "untrailed" areas of the forest

Issue: 4-3 ORV trails in the Forest

Letter· 1310 Allow continued use of the current designated ORV trails as long as frequent monitoring shows that resources are not being seriously and permanently damaged The ORV users in the Raven Ranger District have done a lot of work to reduce erosion on their trails, and I will give them credit for that

Letter. 1625 The destruction by ORV's when used off designated trails is unacceptable - they should be confined to well maintained trails only All trails - hiking and ORV - should be improved and stabilized - erosion from trails is certainly a destructive element in any ecosystem

Response The designation of ORV trails and closure of the rest of the forest to open, cross country riding will give the forest better control and will be able to manage and maintain the ORV use more effectively

Letter. 1391 I have heard of your plan to provide designated trails This sounds like a pointless effort, since only 50 miles are planned The designated trail system would eliminate the feeling of adventure and exploration that you get when going into unknown territory

Response. Unregulated use increases potential for resource damage and conflicts with other users Unregulated, unmanaged use compounds the difficulty to control and manage use

Letter. 1435 I am not against ORV's but because of their destructive effect on the forest ground I think they should be restricted to trails which are designed and maintained to handle them The current trails should be stabilized to stop gullying and erosion They should particularly avoid streamsides and hiking trails

Response: That is our intention in the FP

Letter 115 FS (states) that 250 miles of trails will be constructed How misleading! We already have over 388 miles of trails in and around Boykin Springs And only FIFTY miles of trails are to be provided to replace them!

Letter 216 I am writing referring to the proposed restrictions in the southern Angelina Forest (Boykin) Area There are now in excess of 300 miles of trail open to use I feel that if these trails were properly identified and marked, total impact would be minimal

Letter 1467 ORV users are not asking to have new trails in all of our National Forests We are only asking to keep the ones we have in the Boykin area These trails have been in use for 20 years

Response: There are no designated system trails on the Angelina NF All the "trails" that exist on the Angelina were created over time by cross country, unregulated use Many of these "trails" are causing resource damage

Letter: 277 Existing ORV trails are badly in need of repair, yet 250 miles of new trails are being proposed Why not fix the existing trails first The new trails are not needed since half of the forest is open to unrestricted ORV off trail use

Letter: 1613 the existing (ORV) trail network of over 400 miles would be closed and replaced with up to 50 miles of "designated" trails to be constructed by the FS

Response: There are only 55 miles of designated system ORV trails on the NFGT and all 55 are on the Raven District of the Sam Houston NF All other "trails" in the forest were created over time by unregulated cross country use, many of these "trails" are causing resource damage and conflict with other uses

Letter 414 I strongly urge that use of such vehicles (ORV's) be restricted to trails specifically designated for such use, and that no off trail use be allowed

Response. The intent of the FLRMP is to better regulate and manage the ORV use

Letter· 983 There are not adequate controls on the use of ORV's in the Sam Houston NF Try to keep any ORV trails as far away from hiking trails as possible

Response: Since the Lone Star Hiking Trail is 127 miles long and traverses the entire Sam Houston NF, it is difficult to not cross trails

Letter 20 I am strongly in favor of any plan which will allow the most amount of ORV trail miles Areas of concentrated use will decrease by allowing more trail miles Soil productivity will increase and loss will decrease

Issue: 4-3 ORV trails in the Forest

Letter: 960 I am writing to express my interest and concern about expanding ORV trails many of the trails are very heavily traveled Any expansion of the trail system would be well received and appreciated

Letter: 994 the Raven District is in need of additional designated trails

Letter: 1391 You will also be corralling all the bike riders and ATV riders onto 50 miles of trails, so that trail will be extremely over-used, possibly unsafe, and expensive to maintain

Letter. 1512 top priority needs to be given to additional trails to lessen the impact on already over used designated trail

Letter: 1576 you have been planning to add new trail for a few years When the trail is added it would make more sense to restrict open riding In fact, if it were open today, you would probably not have to restrict open riding because it wouldn't be a problem

Letter: 1584 60 miles of (ORV) trail is not enough to get a good sweat Please do everything possible to open the remaining designated trail that was promised

Letter: 1621 proposing 50 miles of designated trails is inadequate, although it would be a good start Please do not close existing trails until they have been replaced with designated trails mile for mile

Letter 1642 I have written a letter in reply of my concern of possible closure of the Open Riding Area of the Raven District of the Sam Houston NF This would be a grave mistake There are currently not enough miles of trail in the forest system The trails that do exist are OVER USED Closing the Open Riding Area would only aggravate this condition

Letter: 1643 The quality of the short trail systems as it exist today does not promote use by in-experienced riders, expecially women and children It equates to having a public building with out handicap access, that is usable by only a portion of the population Without the quality of riding trails I experienced only a few years ago, the future youth will not be able to acquire these same values The people of America need more family recreation of this type More miles of trail will be required in order to give it

Letter: 1737 With the new Land Management Plan you have a golden oppportunity to make the construction of new trails a priority for the NF in Texas We desperately need more new trail for the growing number of ORV's in Texas There has not been any new trail added since the current Land Management Plan went into effect

Response: The IDT agrees More miles of designated trails are planned

Letter: 1723 the 55 miles of PMT's in the Sam Houston need to be brought up to standards There still are erosion problems here that need addressing Only after these trails have been brought up to standards and can be shown to be maintained at standard (I propose a one year monitoring period) can new trail proposals be initiated

Response: This will hold true for any trail However, forcing concentrated ORV use on 55 miles makes it more difficult to maintain to standard than spreading the same use over 250 miles

Letter: 112 I am against the closure of the Angelina NF to ORV's, specifically motorcycles and four wheelers I am a frequent user of the trail system that currently exists in the area of Boykin Springs and enjoy riding the trails in that area

Letter. 113 I am against the closure of the Angelina NF to ORV's, specifically motorcycles and four wheelers I am a frequent user of the trail system that currently exists in the area of Boykin Springs and enjoy riding the trails in that area

Letter 1158 4b of your Draft Plan is not a reasonable balance 4b would restrict the ORV trails in the southern Angelina Forest to 50 miles as compared to the 400 miles of trails that ORV riders have used in this area for decades without any significant damage to the forest

Letter 1254 My family has been told that yall are going to close the trails at the Boykin Springs area the only damage is these roads and the logging This is nothing but prejudice against the ORV

Letter: 1286 This Land Management Plan Revision is an excuse to close the open riding area

Response: The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage There are no designated system trails on the Angelina NF All the "trails" that exist on the Angelina were created over time by cross country, unregulated use Many of these "trails" are causing resource damage

Letter: 1473 If our trails are closed before new trails are opened, this would be depriving us our rights to ride

Issue: 4-3 ORV trails in the Forest

Letter. 1586 The Sam Houston has been in the process of designating an ORV trail system for the past several years This system, as outlined in the previous LRMP, is not yet complete It is imperative that any effort to close existing open areas must be delayed until the designated trail system is complete per the current LRMP The current language in the Draft LRMP would appear to confine ORV use to an inadequate trail system as it presently exists

Letter: 1652 I'm told that you are planning to build 250 miles of designated trails in the future for riders after you close the open riding area That just doesn't seen quite right Where will we ride in the meantime? Furthermore, it seems to me that long term heavy use of sandy trails causes some of the worst erosion problems I've seen

Letter: 1770 We strongly believe that you should revise your L&RMP to call for the designation/construction of the entire OHV trail system before any of the open riding areas are closed We base our views on the following 1) To close the open riding areas before the trail system is designated will greatly increase the usage on the existing designated trails 2) New trail sections need to be opened as soon as possible to prove that the USFS is dedicated to meeting the needs of the OHV users 3) The closing of the existing open riding areas should be used as "leverage" with the environmental groups If these open riding areas are closed first, these groups will have no reason to support the designated OHV trail system

Letter: 1777 please build/open additional trails for area motorcyclist to ride on PRIOR to the closing

Response The open areas would be phased out as the trail system is enlarged

Letter: 1723 (pg 21 Summary) the 305 miles of trails planned for the Angelina and Sam Houston NFs is entirely too many to allow

Response: The IDT does not understand the rationale for this statement

Letter 1723 It is hard to determine how much of the 250 miles of new ORV trails proposed under Alternative 4b will be in the Angelina and how many will be in the Sam Houston NF's

Response· See plan, app E

Letter· 1723 (MA-4-84) what does "consistent or compatible with adjoining management areas" mean.

Response· Not adjacent to wilderness or developed recreation are two examples

Letter: 1723 FW-147 - you must require not simply permit fencing of ORV trails when they (cross) hiking trails, roads, and ROW Really you should separate trails because hiking and ORV trails inherently are conflicting uses that must be kept separate

Response· FW 147 has nothing to do with fencing FW 146 calls for providing cattle guards when ORV trails cross range fences

Letter: 1723 FW-148 - ORV trails must be moved out of floodplains and wet sites since the areas are sensitive and resource damage is inevitable the 6 inch rutting over 30% of the traffic area is too lenient and allows unacceptable resource damage Why allow any 6 inch ruts at all?

Response Six inch rutting over 30% of the traffic area is a standard established by soils people. Mitigation will be planned for any areas exceeding this standard This would also apply to hiking trails, which have also created 6" ruts in some areas

Letter 1723 FW-154 - define what "maintain safe conditions" means

Response Maintain is defined by the Webster's 9th New Collegiate Dictionary as "to keep in an existing state preserve from failure or decline Safe conditions are conditions not likely to cause injury

Issue: 4-3-1 ORV open areas

Letter: 1723 MA-1-52 - I am totally against off trail riding by ORV's

Issue: 4-3-1 ORV open areas

Letter: 1723 I request that all open riding areas be closed by the signing date of the ROD and that immediate enforcement begin to stop those who are illegally using such areas and destroying the resources there A transition period, open-ended, as you talked about on 11-30-94 is totally unacceptable

Response: Comment noted.

Letter. 128 I am writing to you in regards to the Draft Forest Plan which describes a proposal to close the southern Angelina Forest to cross-country use by ORV's This Forest is currently open to ORV use and I am very much opposed to it's closure

Letter. 1583 I am against the closing of the open riding area, and a priority should be placed on developing new trails withing the NF

Response: The FP proposes to manage ORV use on designated trails in order to reduce and minimize resource damage Managed trails will provide better resource protection.

Letter 1723 The FS has zero business approving any open riding area anywhere in the national forests or grasslands

Letter 1749 Cross-country ORV use is a travesty

Letter: 1765 No unregulated off trail ORV shall be permitted Cross-country only should be by limited, trail and time specific, special permit for a fee to cover the *restoration costs of the inevitable ecosystem and drainage system cost arising from the special destructive forest use by ORV's*

Response: ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter: 1620 *I'm writing to protest the Plan to close most of the National Forest to ATV users I am mainly concerned with areas 50 to 65 (Angelina NF)*

Letter: 1740 Please be advised that I am adamantly opposed to closing more that 24,000 acres of land in the Southern Angelina NF of ORV use It is beyond my comprehension as to how the USFS can make such a proposal and state that this kind of public use of OUR NF is detrimental when the USFS has for years allowed logging, including the devastation of clearcutting

Response: The FP does not propose to close the Angelina NF to ORV use It does plan to manage ORVs to minimize resource damage

Letter 414 I strongly urge that no off trail use be allowed

Letter: 1310 no ORV use off designated trails should be allowed There's no way to control such use and monitoring would be extremely difficult and time-consumimng

Letter: 1641 KEEP the ORV Open Riding Area OPEN

Letter: 1734 The traditionally open riding areas in Angelina, Davy Crockett, and Sabine should remain open The designated open riding area in Sam Houston north of FM 1375 and west of FS 215 should remain open This area was designated an open riding in the original forest plan over twenty years ago, and has been in use as a riding area since 1969, that I know of first hand In all those years no significant damage has occurred to the land

Response: It is the intent of the FP to limit use on the Angelina and Sam Houston NF to designated trails and have very little, if any, open areas on those 2 forests Use on the Sabine and Davy Crockett is small and not planned, as yet, to limit to designated trails

Letter: 1652 I simply cannot understand why you feel it is so important to close the open riding area of the forest The paths and erosion are minuscule when compared to the magnitude of the forest Mother Nature, through her heavy rains and resulting flooding, often causes more damage than we riders cause

Response: Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Issue 4-3-1 ORV open areas

Letter· 1168 PLEASE DO NOT CLOSE our forest (to ORV's) from people like me that cannot walk very far
Letter· 1608 Unrestricted ORV use causes vegetation damage, affects water quality, disturbs animals and causes conflicts with others using the forest

Response: ORVs have been identified as a legitimate use of the NF Our job is to manage to minimize impacts to the resources

Letter. 604 It is my understanding that a Draft Forest Plan has been issued and the plan proposes the closure of the southern Angelina Forest to cross country use by ORVs If this is so, I would respectfully submit my protest I do not see the financial sense in a policy that would in effect prohibit ORVs from the forest, the only practical place for riding

Response: Potential impacts from continued "uncontrolled" use Providing designated trails and concentrating management on these trails and closing open, uncontrolled use is the proposed direction

Letter: 1570 opposed to any closings of open riding areas The FS should establish the long awaited new trail before any closing takes place.
Letter· 1581 If we close the open riding area before the new trails are open its going to force all the riding onto the designated trails I believe this could cause excessive damage to the PMT Please leave the open riding area open until the new trails are finished
Letter: 1600 Of greater concern to me at this time was my learning that the Angelina District Ranger plans to immediately close the southern Angelina to all ORV use if alternative 4B is approved I urge you to allow the continued open use policy on the southern Angelina until the designated trail system, if that option is approved, is in place The southern Angelina has served the ORV public for decades I feel 50 miles of trails is woefully inadequate ORV opportunities in the other National Forests pale in comparison to the southern Angelina
Letter 1637 There is a good chance that the open riding area will be closed and the new plan never approved and everyone will be restricted to the PMT's forever Many families use these trails in the open riding area for their recreation as FAMILIES Please do not take it away from them
Letter. 1645 I would like to see the ORV open riding area on the Raven district remian open until the entire proposed 250 mile trail system is in place
Letter: 1672 Thank you for this opportunity to express my concern about the closing of the open riding area in the Sam Houston NF before the designated trail system that is called for is put in place It is my hope that a new trail system will alleviate the existing pressure on the current trail system
Letter· 1739 I am writing to you concerning the closing of the open riding area of the Sam Houston NF until the designated trail system has been put in place I am strongly AGAINST THIS CLOSURE I feel that the ORVs will overuse the existing designated trail system if this takes place It is imperative that a high priority be placed on getting the proposed new trail designated as soon as possible This new trail has been promised for a long time
Letter: 1741 I do not wish for you to close the ORV open riding area in the Sam Houston NF If you need to close it open the new area first'''
Letter: 1744 I ask that you please leave the open riding area at Sam Houston NF open until the new trail system is ready to ride There are barely any riding areas for motorcycle enthusiast now, and my children and I would hate to lose another
Letter· 1745 I understand there is a possibility of closing some of the open riding area (on Sam Houston NF) Since I have been riding there for 23 years I have seen the condition of the trails deteriorate I have noticed that the more of the trails that are shut down the more impact there is on smaller areas Before closing any trails I hope you folks will consdider the number of people that use these trails

Response This is true A large portion of the proposed trail system should be in place prior to closure of the open area

Letter 1576 I am against closing the open riding area for ORV in Sam Houston NF This action would accelerate degradation on the designated trails which is in the best interest of no one
Letter: 1673 I am against closing the open riding area in the Sam Houston NF until new trails are designed, developed, and put into service We need additional mileage in the NF to handle the increased demand for motorcycling, bicycling, hunting, and other ORV activities Closing the open riding area will only overcrowd the current available permanently marked trails, resulting in a greater environmental impact in those areas My suggestion is that for every mile of newly developed trail in the Sam Houston NF, a mile of open riding area may be closed

Response· There should be a sufficient amount of trail mileage to safely ride on the Sam Houston NF prior to closure of open areas

Letter 1310 ORV use has a generally negative impact on soil and wildlife, as well as on other users who seek quiet and solitude

Response: There are noise level standards which the FS Law Enforcement personnel attempt to monitor It is very difficult to be everywhere for everything

Issue: 4-3-1 ORV open areas

Letter: 1652 The open riding area seems a far better choice for spreading the use (of ATV's) on that part of the forest And remember, there is a lot of forest to be shared by various user groups

Response: Unplanned and unregulated use tends to create resource damage and conflicts with other uses

Letter: 1735 I have enjoyed the open riding area over the years and I believe it would be a great injustice to close it down there is talk of closing the open area down before new trail is put in I believe that the open riding area takes quite a bit of impact off existing PMT Please keep this area open

Letter: 1736 As a regular user of the motorcycle trails in the Sam Houston NF I am very concerned by what I understand as proposed forest service plans to close the open riding area on the west of Lake Conroe I firmly believe that closing the open riding area will do three things 1) Put more strain on the already short mileage of PMT 2) Reduce the attraction of the NF as a riding area 3) Organized Enduro events used to be a major attraction in the NF Today with such small amounts of trail that is ridden regularly by a lot of the competitors the events are much less interesting and attract less people that in the past With the open riding area off limits this can only result in the rapid down spiral of motorcycling in the NF

Response: The IDT agrees More miles of designated trails are planned

Letter: 1512 I feel it is important that the open riding area not be closed until the additional trails is completed

Letter: 1528 I'm NOT in favor of closing any open land or existing trails (for ORV's) until the plan for expansion can be in place and at least begun

Letter: 1586 We would urge you to leave the open area available to ORV use until the PMT is totally completed we also urge you to actively pursue completion of the PMT so that the agency can then begin carrying out any new management prescriptions for the areas now designated as "open"

Letter: 1628 I am against the closing of the open riding area in Sam Houston NF until the designated trail system being addressed is put in place If the open area is closed before the additional trail is completed, it will cause even more impact on the already over used designated trail An interesting side note, I have observed that "mother nature" caused more self-inflicted damage and erosion in the recent Houston area floods, than a hundred years of ORV use could have done Interesting how powerful the elements are against man's feeble attempts

Letter 1647 the open riding area should remain open, at least until the additional trails which we of TRH has previously been promised are implemented The lack of progress on these new trails has caused the existing trails to experience overuse due to continued influx of riders and other users I will offer my help and recruit that of others in the goal of building and maintaining said trails in conjunction with your department, which has worked so well with our organization in past years

Letter 1737 The designated trail that we currently have is so over used that it is not fun to ride and cannot be properly maintained If the open riding area is closed before the new trail is built it will only cause more over crowding on the existing designated trail I urge you to keep the open riding area open until the new trail that is planned can be completed

Letter: 1747 Whenever I visit friends in Houston I ride motorcycles in the Sam Houston NF, in a Tread Lightly manner I am distressed to learn of the proposed closing of the open riding before additional trails are opened Please keep the current riding opportunities open until alternating trails are open

Letter: 1769 it is appropriate that the currently open area not be closed to motorized recreation use until trails replacing the current recreation opportunity be open to public use

Letter: 1803 we're opposed to the closing of the open riding area in Sam Houston NF until the designated trail system that is now currently called for in the ORV Management Plan Revision is put into place

Response: The open areas would be phased out as the trail system is enlarged

Letter 857 I recommend that the "Open Riding Area" remain open until the 250 miles of designated trails are completed

Letter 887 I am adamantly opposed to closing the open riding area in the Sam Houston NF before the addition of the new 250 mile trail system

Letter: 1286 Please do not close the open riding area until the proposed additions are completed

Response: Revision of the FP will incorporate some form of retaining open areas until trail miles are designated

Letter: 1723 MA-2-52c - no open riding areas can be justified based on their potential to disturb wildlife

Response: If wildlife is being disturbed in open areas, monitoring will identify that problem & evaluate mitigation

Issue: 4-3-1 ORV open areas

Letter: 1734 All areas of the forest should be considered open to ORV use unless signed closed It will be very difficult and unfair to enforce closure of land that is not signed Example, if I am driving down a road in my car, I assume that road is open if there is no gate or sign telling me it is not open to public access For the casual ORV user it is unfair to assume they know the land is closed if there are no signs

Response: It is the responsibility of the ORV user to know if the area is open or closed Signing all closed areas would create sign polution

Issue: 4-4 OHV

Letter 2 Since the majority of land in Texas is privately owned, we place at a premium the opportunity to enjoy recreational four-wheeling in a safe, legal environment It is of some concern then, to learn of possible and/or pending trail closures in the Angelina NF and more directly the Boykins Creek Recreation Area We would like to know the status of the different tram roads located in this area, and any changes in their status in the near future

Letter: 94 I was extremely disappointed that none of the FS plans included any OHV trails

Letter: 115 My second thought is about Off Highway vehicles which do disturb the land to a much greater degree There are now not nearly so many miles of trails that they can use so perhaps these are the trails that should be constructed

Letter: 615 I feel that the plan explained to us did not address exclusion of OHV's from the plan

Letter: 650 jeep trails

Letter 1227 we were suprised and alarmed to learn that in the Draft Plan for the Angelina NF currently being studied, that four wheel drive vehicles (OHV) are not even being considered as one of the user groups I ask that we please be considered in an updated version of the Forest Draft Plan

Response: To provide recreational opportunities for four-wheel drive vehicles, the forest plans to leave open some of the existing Level "D" (low standard) roads that are constructed for timber sales The availability of maintenance dollars will dictate to a large degree how many miles of these roads will be left open As the plan is implemented year by year, budget along with demand for 4 wheel drive use will be utilized to determine how many & which roads might be left open &/or closed Four-wheel drive vehicles will be restricted to open roads & designated travel ways

Letter: 1802 By restricting OHV use to designated trails (and then designating only a fraction of those currently available), you are implementing a solution to problems that you have failed to demonstrate exist You are imposing a huge social cost (denial of badly needed recreation opportunity) for an insignificantly small environmental gain

Letter 1802 open OHV use does not equate to indiscriminate use An open riding area should be monitored An open riding area does not mean that you cannot close and rehabilitate where resources are adversely impacted In an open riding area, users should be encouraged to stay on existing trails and "Tread Lightly" All users should be respectful toward others Retention of open riding in the Angelina is clearly within the DLRMP's response to the issues The proposed decision that retains only 55 miles of designated trails out of a current 400 miles (approximate) is a prescription for a recreation disaster

Response There will be designated travel ways & open system roads available Cross country travel will be prohibited on the south side of the Angelina

Letter. 1 start some type of 4-wheel drive area

Response This is not a plan decision Your letter has been forwarded to the appropriate office

Issue: 4-5 General

Letter: 1461 The FS inadequate sand and soil barriers on logging roads in Davy Crockett NF compartment 96 simply do NOT prevent ORV's (and ATV's) from using them, as they either go around the earth mounds or drive over them

Issue: 4-5 General

Letter: 1620 We do not, nor have I seen, anyone tearing up or impacting the environment in any way while riding their AVT's through the National Forest I cannot however, say that for loggers and other commercial interests

Response: Comment noted

Letter: 888 If cost for this program (trail expansion) is a problem, why not charge an ORV users fee? I am certain that every serious off-road rider would be willing to pay a reasonable fee for the privilege of riding on public land

Response: An ORV permit sticker is something that has been discussed Until such time that all the money collected can be kept on the forest and used directly for trail management, it probably won't be implemented

Letter: 1613 If the FS cannot secure adequate funding through existing channels, some sort of fee program on ORV users to fund additional law enforcement officers would be appropriate

Letter. 1621 I propose a yearly ORV/multi-use fee to help defray construction and maintenance of a trail system

Response· An annual permit fee for ORVs has been discussed and might be proposed in the future

Letter: 1605 Safety hazard reduction management should be limited to areas adjoining developed public access areas, e g. developed hiking trails, riding trails, etc

Response· Safety hazard reduction will be considered everywhere or at least signed to warn users

Letter. 1723 (pg 46&47 DEIS) construction of ORV trails and roads uses the same phrase what is the real difference between a road and an ORV trail? on page 49 you say effects of trail construction Yet you do not acknowledge that trails continue to deteriorate even with such mitigation Rodney Peters on 11-30-94 stated that streams were having their channels altered due to ORV trails and there is zero discussion of this problem and how it will be resolved

Response: MA4 S&Gs set direction for mgmt in streamside mgmt zones for trails

Issue· 5 RED-COCKADED WOODPECKER (RCW) MANAGEMENT

Issue. 5-1 Addressing RCW Management in the Forest Plan REVISION

Letter: 1651 The RCW Habitat Management Areas identified under alternative 4B encompasses over 53% of the Texas National Forests Under the proposed silvicultural treatments to be used in these areas, I believe the National Forests will become susceptible to insect and disease problems

Response: The EIS does discuss the forest health implications of the alternatives in Chapter III, Part I(a) Though under alternative 4b rotation age will be increased in some management areas, forest health risks will be minimized by using the IPM decision key to assist in management strategy and by restoring longleaf pine to its historic range

Issue 5-1 Addressing RCW Management in the Forest Plan REVISION

Letter: 1460 The objective of the Draft Plan is stabilization and increased RCW populations Therefore, it is outrageous for a single bird or a single colony, even in wilderness areas, to be considered "non-essential"!! (MA-2-131)

Letter: 1603 The Council finds the forest plan's implementation of the draft RCW guidelines overly restrictive believes that the FS has not applied flexibility in applying such guidelines

Letter. 1603 Any suggestion in the ESA that the FS should maximize RCW recovery is countermanded by direction in the Multiple-Use Sustained Yield Act that timber production objectives should prevail over wildlife objectives (16 USC Section 528--the wildlife objective is "supplemental to" and cannot be exercised "in derogation of "the timber objective" set forth in Section 475"), US vs NM 438 US 696,706-15(1978)

Letter: 1619 RCW receiving excessive consideration

Letter· 1636 Alt 4B is over balanced towards protection of RCW - which has ranges outside of NFGT

Letter: 1723 flaws in the RCW DEIS but you accept the document as the word This means that your documents are flawed too!

Letter· 1723 MA-2-52 - you should not have to prove ORV's or other motorized equipment is harmful They should be prevented as a matter of course to not allow any harm to occur during breeding season Why would you want to allow any breeding to be unsuccessful when the RCW trend is still downward Warren Starnes said on 11/30/94 at a Trails Workshop that the RCW was still dropping He said he thought it had almost stabilized but it was still in decline

Response. Comment noted

Letter· 1634 I question the value of the corridors for RCW management & recovery; especially the 2 mile width

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter 991 Jumping from the current 176,000 acres managed for RCW to 338,637 acres in MA 4B appears to be premature There is no evidence at this time that the RCW population will expand to utilize all this additional land There would appear to be opportunities to manage much of this land like MA 1 and shift to MA 2 as rapidly as RCW expand It has been our experience that RCW are slow to expand beyond existing home ranges For example, the density of RCW colonies on our state forests is about double that of your most active populations We believe establishing new clusters artificially should be treated as strictly research and not made an operational procedure until a record of successful attempts can be established

Letter· 1439 I believe that there is too much emphasis on the RCW and acres devoted to its management

Letter 1510 Alt 4B contains much more RCW habitat management area than is needed for the biological needs of the RCW PLEASE reduce this amount It is also based on draft RCW management and is premature Wait until a final RCW management plan is completed before developing a management plan for RCW Don't chase ghosts

Letter 1603 Alt 4b provides for RCW populations to expand beyond recovery objectives This is an action not necessary No provision of the Endangered Species Act requires the FS to structure all of its actions in the NF in TX to maximize the recovery rate for the RCW

Letter. 1651 The amount of acreage included in the corridors between HMA's in alt 4B is a cause of concern Designating over 100,000 acres in additional HMA corridors is not justified in the draft RCW guidelines Placing this additional acreage in a constrained operational status would be detrimental to the health of the National Forests in Texas and have a negative impact on the economies of twelve East Texas Counties

Letter: 1733 Alt 4B appears to over-react by increasing current levels of colony area plus recruitment stands with nesting boxes and connecting corridors

Response: HMA size in the selected alt has been reduced from 4B acreage Careful analysis by NFGT developed new HMA's for each forest that reflect realistic expansion by RCW during the 10-15 year life of this FP A three level approach to monitoring (implementation effectiveness and validation) will measure the success of silvicultural and other mgmt actions in HMA's as described in the monitoring of the FP to evaluate the success of RCW management actions

Issue: 5-1 Addressing RCW Management in the Forest Plan REVISION

Letter: 1310 It is unwise and irresponsible to return to the even-aged system which brought about the sharp decline of the RCW in the first place--to the brink of extirpation! By the FS's own admission, the modified shelterwood system is untried and unproven Why use an unproven system, when selection management, as ordered by the Court, has reversed the decline of the RCW?

Response: The USFS has, and continues to take, a leadership role in the management of the RCW The background and specifics of the RCW in & on NFGT has been well documented in the NFGT 1992 Analysis of the Management Situation and 5-year FP Review It is important to acknowledge that the TX court-ordered comprehensive plan was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion from the USDI F&WLS Though short-term population improvements have been witnessed in TX, much of the improvement is attributed to habitat improvement at cluster sites (artificial cavities, augmentation, and midstory control) Long-term habitat improvement must allow more flexibility for some of the court-ordered mandates, the proposed RCW EIS action attempts to insure a continuous supply of habitat through a mix of silvicultural techniques including the modified shelterwood system This system offers the flexibility to provide both habitat and sufficient regeneration through staged overwood reduction, the lack of regeneration was the primary concern in the court-ordered plan Long-term management of RCW will require all silvicultural tools in the future, which includes both uneven-aged (UEAM) and even-aged management (EAM) techniques EAM has been used successfully on the Vernon RD of the Kisatchie, Francis Marion and Appalachicola NF successfully maintaining large viable RCW populations These areas have demonstrated over time that they provide the most dense RCW population, much more dense than UEAM systems would produce The court-ordered FP was developed as alternative, but later eliminated due to the USDI F&WLS jeopardy opinion

Letter: 1310 Rotation ages in MA2 are too short

Response: A 70-80 year rotation of timber is unsuitable for RCW population expansion and recovery This FP, depending on the pine species, calls for a 80-120 year rotation Rotation periods have been extended for suitable pine species to enable RCW populations to sustain themselves without the use of artificial cavities or translocation Recent studies have indicated a need to extend pine rotation periods to provide sufficient heartwood diameter at cavity level

Letter: 1310 Midstory and overstory hardwood control have been excessive in the last six years and promise to be excessive under alt 4B
Letter 1723 (pg 23 Summary) - 20-30%, at a minimum must be left in hardwood. This is the hardwood density, or greater, that RCW evolved with in the Sam Houston NF which was a mixed pine-hardwood forest But you want to make it a pine plantation I object

Response The RCW EIS is developed to provide guidance in pine or pine-hardwood sites This FP describes more specifically land type associations (LTA's) within the USFS ECS that provide these pine dominated habitats LTA's and stands that have a hardwood dominated ecological component will not be included within the pine and pine-hardwood prescriptions for the HMA's Likewise, special areas such as Big Creek Scenic Area, have not been included or calculated into the pine and pine-hardwood habitats for RCW management These specific sites, though completely surrounded by upland pine dominated HMA landscapes, will be managed for the specific character and emphasis described in the RFP for the NFGT The mix of hardwoods in pine stands is based on optimum conditions for RCW and species that prefer similar habitat It is not designed to provide optimum or maximum mast for species that require this habitat Though hardwood control will be an accepted practice, sites with a natural hardwood component will be managed to retain that character If the site is ecologically defined as a hardwood dominated site through the ECS, then it will be managed as such and not as part of the RCW HMA pine dominated uplands Ecological conditions specifically for TX have been described in detail within App A of the DFP and App. H of the DEIS for the FP

Letter: 1600 The proposed RCW habitat management will lead to the RCW's expatriation from the NFGT in 50 to 70 years Turning the southern Angelina over to RCW habitat negates the concept of multiple use that has served the public over the years
Letter: 1603 after the FS has satisfied the ESA minimum of "no jeopardy" and "no take", the agency has the discretion to choose how many additional forested acres should be devoted to maximizing RCW recovery vs how much of the limited forest resource should be made available for other legally mandated multiple uses, such as outdoor recreation and timber production

Response: Management Area delineation and objectives that emphasize habitat characteristics favorable to RCW provide a wide range of commodity and non-commodity benefits, responding to MUSY/ACT 1960 directives

Issue: 5-1 Addressing RCW Management in the Forest Plan REVISION

Letter: 1603 The RCW Guidelines have been released in draft where public comment has been undertaken The agency is now reviewing the public comments and revising the draft document The final decision and EIS is expected to be released in Jan 1995 The Texas forest plan action which relies on the draft RCW guidelines and subsequently restricts the ASQ severely, is inappropriate and could be the basis for appeal The Council recommends Final EIS not be released until the Forest Service's Regional RCW Final Guidelines decision and EIS are released should there be changes in the Regional RCW Final Guidelines, the Forest must reconsider the impacts of such changes on the Texas DEIS and provide for public comment before a Final Forest Plan is released

Letter: 1723 (pg 92 Plan) the RCW DEIS is just that, a draft and you do not know what will be adopted. ..this LRMP needs to be amended when the RCW FEIS comes out and give reviewers the opportunity to comment on how this will impact resources in the four Texas National Forests through this LRMP

Response: The NFGT FP and EIS incorporate all modifications found in the Final RCW EIS and Implementation guides Analysis of alternatives did not change substantially the outputs or trends used in evaluation of the 9 original NFGT EIS alternatives

Letter: 1603 If the Forest does decide to manage for what it believes to be the minimum requirements under the RCW guidelines, the Forest has an obligation to 1)clearly state that it intends to manage beyond the RCW guidelines, 2) identify all of the biological, economic and social tradeoffs of managing beyond the guidelines, 3)describe why the Forest believes that the tradeoffs are in the best interest of society, and 4) address the requirements of S Res 285, as approved by Senate in Oct 1994

Response: The FP and EIS will follow habitat management guidelines in the RCW EIS Size of HMA's on each NFGT forest is larger than described in the RCW EIS to allow development of pine and pine hardwood habitat adequate for anticipated RCW population expansion through 2010 Modifications in management guidelines were made to address S R 285 and a full analysis of social economic biological and physical impacts can be found in the NFGT EIS

Letter: 1605 The USFS intends to implement an untried, unproven management plan (the RCW EIS) in place of the shown-to-be-successful court-ordered plan

Letter· 1679 The studies that support even-age cuts in RCW habitat are flawed The Draft FP again proposes even-age cuts for managing RCW habitat even though it has been twice rejected by the court

Response: The court-ordered TX comprehensive FP was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion from the USDI F&WLS Through short term population improvements have been witnessed in TX, much of the improvement is attributed to habitat improvement at cluster sites (artificial cavities, augmentation, and midstory control) Long term habitat improvement must allow flexibility for some of the court-ordered mandates, the proposed action attempts to insure a continuous supply of habitat through the modified shelterwood system This system offers the flexibility to provide both habitat and sufficient regeneration through staged overwood reduction, the lack of regeneration was the primary concern in the court-ordered plan

Letter 1679 The Draft FP fails to discuss the need for and advantages of having old growth in RCW habitat A component of older trees is necessary, including leaving trees after natural fall for the benefit of RCW and diversity . puts too much emphasis on herbicides to control midstory in RCW habitat, hand tools should be used relies on even-age cuts to remove slash pine for the purpose of phasing in longleaf pine for recruitment stands Single tree selection should be used to minimize damage to the Forest

Response· Old Growth conditions do not equate to RCW habitat RCW utilize a range of age classes in pine stands for foraging and nesting Direction in MA-2 provides this habitat requirement, and emphasizes fire as the preferred method of maintaining pine dominated uplands with an open understory Herbicides, mechanical and hand tools may all be used if fire does not create the DFC Both EAM and UAM will be required in the management of RCW habitat to obtain the desired results

Letter: 1723 (pg 88 DEIS) why do you make Alt 6 try to have essential RCW habitat in wilderness when you say for other alternatives you do not allow this? This is biasing alternatives

Response: The wilderness areas proposed in alt 6 would incorporate many existing RCW sub-populations Designating that many clusters as non-essential would be irresponsible

Issue: 5-1 Addressing RCW Management in the Forest Plan REVISION

Letter: 1723 ...by allowing cutting of pines when they are 80 yrs. old with no definition of what a SPB area is you ensure that all four TX NF can be cut anywhere by your definition or lack of definition

Response: TX is recognized as an area with a history of SPB epidemics (see ams/5 yr review) Allowing large acres of loblolly or shortleaf pine habitat to exceed 80 year rotations could potentially develop catastrophic situations. Rotation ages are based on the best available information to supply a continuous supply of high quality RCW habitat in perpetuity 80 year rotations will ensure large areas of older forest without the risk of catastrophic events or SPB epidemics Potentially a significant number of trees that are much older than the stated rotation ages will be present throughout the HMA In TX, should the 80 year loblolly pine rotation for SPB considerations be implementated, all overstory trees will be left in perpetuity All clusters, recruitment and replacement stands will have no rotation established and would remain until they no longer provide suitable nesting habitat These stands will provide numerous stand sized (10 acres or larger) patches throughout the HMA that allows the older forest or relict tree characteristics to develop

Letter: 1723 (pg 87 DEIS) your assertion that campgrounds would be located outside clusters "if possible" is not reassuring and is a significant loophole I am totally against moving clusters if they move into recreation and trail areas

Response: Disturbances by humans have proven to adversely impact reproductive success in many species Major disturbances such as construction or human activity will not be permitted in RCW clusters, especially during the nesting season RCW that excavate a cavity and move into existing facilities or trails would not be affected unless monitoring indicates an adverse effect on the RCW As populations of RCW expand, monitoring will take place that evaluates the cause and effect relationship of recreation use and RCW disturbance

Letter: 1723 (pg 35 maps) you have both Big Creek Scenic Area and Winters Bayou Scenic Area being managed for RCW These are hardwood sites and many cases stream or bottomland hardwoods Yet you propose to chop them up for RCW management If you do not propose this then you need to make sure that you say this in no uncertain terms

Response: Management emphasis in MA-2 is to enhance RCW habitat Hardwood midstory control would be in cluster, replacement and recruitment stands exclusively The FP and RCW EIS contain allowances for a component of hardwoods in these sites and ensuring some "in stand" diversity

Letter: 354 The "Preferred Alternative" includes more RCW management area than present (Alt #1), many existing colony sites are excluded from the new plan RCW mgmt areas

Response: No active clusters were excluded from HMA's in alt's 2-8

Letter: 1679 The Draft FP has the effect of limiting RCW habitat Populations not in known habitat are not protected

Response: Per the RCW EIS, "If an active cluster should be found outside an HMA immediate action would require establishment of a 3/4 mile radius circle around it with management the same as inside the HMA"

Letter. 1605 MA-2-131 - The objective of the Draft Plan is stabilization and increased RCW populations Therefore, it is outrageous for a single bird or a single colony, even in wilderness areas, to be considered "non-essential"

Response Sufficient habitat development has occurred on the primeter of both Little Lake Creek & Upland Island to ensure adequate HMA for wilderness clusters

Letter: 1723 (pg 9 plan) you talk about ensuring the protection of old growth forest stands and exemplary plant communities but you ignore that in the guise of protecting RCW habitat from SPB The SPB EIS does not even recognize biodiversity but your actions ensure that landscape biodiversity will not be protected when it comes to logging supposedly for RCW via SPB control

Response: Additonal discussion of SPB control actions & affects to Old Growth, Frahmentation, & RCW is found in Chapter III of the FEIS

Letter· 1723 MA-2-131 - scenic area clusters are also nonessential and must be designated as such

Issue: 5-1 Addressing RCW Management in the Forest Plan REVISION

Response. Mgmt of scenic areas differs significantly from Wilderness Mgmt RCW clusters can be managed successfully in special areas based on DFC & appropriate S&Gs

Letter: 1679 The Draft FP fails to discuss the advantages of selection management in managing RCW habitat

Issue: 5-2 Management for RCW

Letter: 1310 Richard Conner has documented RCW feeding on fallen slash, therefore spraying slash with insecticide endangers RCW
Letter 1604 Recommendation - MA 2 Continue augmentation and artificial cavity installation judiciously
Letter: 1646 you have over emphasized the importance of the RCW in the plan proposed for future wilderness sites
Letter. 1670 Your agency should be congratulated for the recovery of the RCW in Texas Somehow, I cannot but think your management of the colonies is timber-oriented
Letter 1723 MA-2-117 - I am against any form of even-aged management
Letter: 1802 We support the recovery of the RCW Restrictions, if necessary, should be applied to all users Instead of OHV designated trails (and then designating precious few), we would suggest, if necessary, some kind of seasonal trail designations for all users during sensitive times like nesting and fledging seasons

Response. Comment noted.

Letter: 1310 Don't cut RCW cavity trees for any reason, dead or alive

Response: The RCW EIS prohibits the cutting of cavity trees (living or dead) in active and inactive clusters unless they pose a threat to public safety, or to protect the cluster, replacement or recruitment stand from insect attack The USFWS must be contacted and issue a concurrence before any cavity tree can be cut

Letter 373 I am also concerned about adequate buffers around RCW nest trees, rather than just saving one, single tree

Response: The RCW EIS requires the boundary around active and inactive clusters be at least 200 ft from all cavity trees The cluster will be at least 10 acres in size

Letter 1604 Recommendation - MA 2 Restrict all timber management to individual tree selection
Letter: 1604 Recommendation - MA 2 Phase in Longleaf pine for Slash pine, on appropriate sites, by selection felling (never by even-aged)

Response The choice of harvest methods is based on a site-specific analysis and designed to meet the DFC of the site The environmental effects of the different harvest methods on the RCW is addressed in the RCW EIS This revised Plan incorporates that document

Letter. 1256 Rather than set aside 15% of the forest type to serve as corridors as provided in Alternative 4b in order to link isolated RCW colonies with larger habitats why not physically transfer isolated RCW populations to larger habitats with use of artificial cavities? This approach would eliminate the need to establish single-use corridors and release some 95,000 acres for multiple use This approach also would favor the long-term survival of these isolated RCW colonies
Letter: 1308 The RCW habitat corridors proposed in the preferred alternative seem unnecessary to me, especially in light of increasing RCW populations

Issue: 5-2 Management for RCW

Letter: 1603 Alt. 4b includes 102,141 acres for corridor purposes This is in addition to 236,496 acres identified in the draft RCW guidelines as Habitat Management Area (HMA) for the Texas NFs In making this additional designation of 102,141 acres, the draft EIS does not justify the need appropriately

Letter· 1627 Recovery and stability of this species is important but should not take precedence over all values of the forest Alt 2 provides enough acreage for RCW while maintaining a balance with producing forest acres

Response: HMA size in the selected alt. has been reduced from 4B acreage Careful analysis by NFGT developed new HMA's for each forest that reflect realistic expansion by RCW during the 10-15 year life of this FP A three level approach to monitoring (implementation effectiveness and validation) will measure the success of silvicultural and other mgmt. actions in HMA's as described in the monitoring of the FP to evaluate the success of RCW management actions

Letter: 858 I suggest that before conducting midstory removal, review of the areas pine canopy density be taken into consideration If too much light enters, ease up on the hardwood clearing. Or if the RCW has reached a set population density, do not continue the midstory removal program for that area

Letter: 1604 Recommendation - MA 2 Do not single out midstory or hardwoods for reduction or elimination If midstory or understory density suppresses pine succession, balance the diversity by hand tools.

Letter 1723 (pg 87 DEIS) you must not almost totally get rid of hardwoods in SHNF in colonies, replacement, and recruitment stands Warren Starnes and Bill Bartush tell me they thought not as much hardwood removal was required as has been done I have also been told that by USFWS biologist Mary Jo Stegman by accepting the RCW DEIS as is you ensure that more hardwoods will be cut

Response. The RCW EIS is developed to provide guidance in pine or pine-hardwood sites This FP describes more specifically land type associations (LTA's) within the USFS ECS that provide these pine dominated habitats LTA's and stands that have a hardwood dominated ecological component will not be included within the pine and pine-hardwood prescriptions for the HMA's Likewise, special areas such as Big Creek Scenic Area, have not been included or calculated into the pine and pine-hardwood habitats for RCW management These specific sites, though completely surrounded by upland pine dominated HMA landscapes, will be managed for the specific character and emphasis described in the RFP for the NFGT The mix of hardwoods in pine stands is based on optimum conditions for RCW and species that prefer similar habitat It is not designed to provide optimum or maximum mast for species that require this habitat Though hardwood control will be an accepted practice, sites with a natural hardwood component will be managed to retain that character If the site is ecologically defined as a hardwood dominated site through the ECS, then it will be managed as such and not as part of the RCW HMA pine dominated uplands Ecological conditions specifically for TX have been described in detail within App A of the DFP and App H of the DEIS for the FP

Letter: 1603 Expansion beyond recovery objectives is not necessary If the Forest does decide to manage for what it believes to be the minimum requirements under the RCW guidelines, the Forest has an obligation to (1) clearly state that it intends to manage beyond the RCW guidelines, (2) identify all of the biological, economic and social tradeoffs of managing beyond the guidelines, (3) describe why the Forest believes that the tradeoffs are in the best interest of society, and (4) address the requirements of S Res 285 as approved by Senate in October, 1994

Response: The FP and EIS will follow habitat management guidelines in the RCW EIS Size of HMA's on each NFGT forest is larger than described in the RCW EIS to allow development of pine and pine hardwood habitat adequate for anticipated RCW population expansion through 2010 Modifications in management guidelines were made to address S R 285 and a full analysis of social economic biological and physical impacts can be found in the NFGT EIS

Letter: 1604 RCW standards, proposed by the Forest Service in 1994 allow "modified shelterwood, and even some clearcutting The FS presents its theory that this would be better for RCW, even though the Hon Robert M Parker, after trial, has twice rejected this theory and has insisted on selection management as best for the RCW The Draft EIS is simply one more effort by the FS to escape the injunction of Judge Parker, and thereby to throw the RCW back into the decline that it suffered under even-aged logging

Letter. 1605 RCW standards, proposed by the FS in 1994 allow "modified shelterwood", and even some clearcutting The FS presents its theory that this would be better for RCW, even though the Hon Robert M Parker, has twice rejected this theory and has insisted on selection management as best for RCW The DEIS is simply one more effort by the FS to escape the injunction of Judge Parker, and thereby to throw the RCW back into the decline that it suffered under even-aged logging Dr Jerome Jackson, the world's foremost expert on RCW, rejects shelterwood because its low BA exposes pines to windthrow

Issue. 5-2 Management for RCW

Response· The court-ordered TX comprehensive FP was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion from the USDI F&WLS Through short term population improvements have been witnessed in TX, much of the improvement is attributed to habitat improvement at cluster sites (artificial cavities, augmentation, and midstory control) Long term habitat improvement must allow flexibility for some of the court-ordered mandates, the proposed action attempts to insure a continuous supply of habitat through the modified shelterwood system This system offers the flexibility to provide both habitat and sufficient regeneration through staged overwood reduction, the lack of regeneration was the primary concern in the court-ordered plan

Letter: 1723 (pg 16 DEIS) you do not allow the pine to grow old enough for the best RCW cavity tree habitat

Response· Old Growth conditions do not equate to RCW habitat RCW utilize a range of age classes in pine stands for foraging and nesting Direction in MA-2 provides this habitat requirement, and emphasizes fire as the preferred method of maintaining pine dominated uplands with an open understory Herbicides, mechanical and hand tools may all be used if fire does not create the DFC Both EAM and UAM will be required in the management of RCW habitat to obtain the desired results

Letter: 55 We think the endangered RCW should be protected completely-why log the forest at all?
Letter: 1605 Thinning in RCW management areas should only be carried out for conversion of even-aged stands to uneven-aged stands
Letter: 1617 Do not reinstate any even-aged cutting within 1200 meters of Red-Cockaded colonies That is what nearly destroyed the species to begin with
Letter· 1662 Do not reinstate or allow even-aged logging within 1200 meters of RCW colonies

Response. Management efforts are directed at maintaining high quality RCW habitat in perpetuity Lack of management thinnings, regeneration, prescribed fire, etc will not assure this long term objective

Letter 991 making major land management decisions based on assumptions about RCW future needs is not prudent Managing shortleaf and longleaf on 120-year rotations may be a disaster In Texas, we have experienced scattered residual trees that are very old, but not entire stands We agree with classic even-aged and two-age class management as proposed for MA 4B We are uncertain about the impact of leaving 40 BA over an extended period What impact will that much overstory have on regeneration and what risk will SPB pose to these older trees You should plan periodic thinnings to maintain this 40 BA

Response Rotations established are 80 years for shortleaf and loblolly pine and 120 years for longleaf pine This is based on the best scientific information and with the involvement of scientists, both within and outside the USFS Management actions and stand treatments will be monitored to ensure long term habitat for RCW and timber production

Letter. 1310 Dr Jerome Jackson had to say 6/20/92. a) Using flying squirrels as an excuse for removing hardwoods is not a good reason because flying squirrels and RCW have coexisted for thousands of years, b) Midstory needs to be open, but you don't need to remove every hardwood What is needed is a natural mosaic, c) Prescribed burning is better in summer because that is the natural burning season Rather than burn every five years, burn once at three, once at seven, etc d) One problem with shelterwood is that BA is so low that windthrow becomes a major problem, e) SPB buffer cutting eliminates all pines, including those that have a genetic resistance to SPB

Response Dr Jackson's comments are noted, and in general are incorporated into direction of the proposed action through retention of 6 snags per acre, hardwood midstory and overstory allowances, emphasis on growing season prescribed burning, a modified shelterwood system, which reduces windthrow, and emphasizes management for RCW clusters outside of existing wilderness areas.

Letter: 1387 What is your goal for number of RCW in our National Forest? If you do not have a specified number, how will you know when the wilderness devotees will be happy?

Response. NFGT population objectives for RCW are stated in the FEIS and RCW EIS

Letter: 1409 The RCW has been favored over animals, plants, and people Not doing midstory cutting for the RCW would leave a better environment for many more animals, birds and plants I would like to see a more natural balance of plants, animals and birds in the forest

Issue: 5-2 Management for RCW

Response: There will be few impacts on wildlife species such as deer, quail and wild turkey Some species of hardwood trees and shrubs may be eliminated or greatly reduced through prescribed burning and other midstory control measures This would be expected to result in a decrease in availability of mast on which some wildlife species are dependent However, some mast producing species will be enhanced with an open midstory Overstory mast producers, if present, would probably not be affected Because of the limited mast production capabilities of some midstory species and the fact that overstory mast producers will probably not be affected, the overall effect on mast dependent species is very likely going to be minimal In contrast, a majority of herbaceous native plants, animal and other species which occupy similar habitat to that of the RCW depend on the same fire dependent ecosystem as the RCW Therefore, the use of fire as a management tool to reduce midstory should have little or no impact on these species Growing season burns (spring-summer) will be used in most cases, however, burning will occur throughout the year when the weather is suitable

Letter: 1458 I have personally observed RCW nests along ORV trails that have been in use 10 years or more If ORV's are disturbing these birds, why do they continue to build nests along these trails where there is constant ORV activity? The study that was conducted on the RCW habitat contains many suppositions there is no clear, scientific link between the reproductive success of the RCW and ORV use in their habitat

Letter: 1507 There are no definitive studies to show that ORV usage has had any detrimental affect on the RCW

Letter: 1600 low level jet bomber flights over RCW colonies and showed no effect on RCW nesting activity This leads me to believe that ORV use has no effect on the RCW A biologist has stated that based on the effect that ORV use has on other bird species that ORV use must be detrimental to RCW nesting success This flimsy linkage is very weak science To curtail so severely one of the largest user groups in the southern Angelina is wrong

Letter: 1613 There are no studies whatsoever that suggest any link between ORV use and wildlife reproduction. In some areas which were informally studied, the RCW seemed to thrive in areas near ORV trails

Letter: 1621 A concern , is that the RCW is listed as endangered, and some of the multiple use trails run through its colonies This is allegedly detrimental to its future, yet no objective studies have been done which show this In fact, the colonies have co-existed with ORV usage for over 20 years

Letter: 1772 When I ride through the forest, I see many woodpeckers I am unable to understand how ATV's are doing any harm

Letter: 1802 The mgt prescription for the RCW states that a broad spectrum of recreation opportunities (including OHV) can be accommodated within RCW habitat It does single out the OHV user, stating that OHV use must occur on designated trails We maintain that if the RCW is sensitive to one kind of human disturbance, then it should be sensitive to all You have produced no documentation that states whether or not they are sensitive, and we suspect that none exists Remember, the subjective opinion of an "ologist" who may be predisposed against OHV recreation DOES NOT COUNT! We have the right to expect that decisions be based on hard facts

Response: Disturbances by humans have proven to adversely impact reproductive success in many species. Major disturbances such as construction or human activity will not be permitted in RCW clusters, especially during the nesting season RCW that excavate a cavity and move into existing facilities or trails would not be affected unless monitoring indicates an adverse effect on the RCW As populations of RCW expand, monitoring will take place that evaluates the cause and effect relationship of recreation use and RCW disturbance

Letter: 1460 Thinning in RCW mgt areas, especially in foraging habitat, has not been proven to be necessary for RCW stabilization SPB hazard reduction should not be used as a reason to perform major thinning in RCW mgt areas!

Response: We disagree, habitat management for RCW must ensure large, contiguous stands of pine that would be susceptible to SPB if appropriate treatments are not applied

Letter: 1603 FS has no idea of how much sooner recovery will be reached by this additional designation of HMA acres Furthermore, the agency should provide consideration for additional means to reach recovery such as translocation

Response: Direction in MA-2 provides applications of habitat species management (including translocation) that should allow expansion of RCW populations to stated objectives

Letter: 1604 Recommendation - MA 2 Require saving a substantial (at least 30 square feet per acre basal area) consignment of trees older than 100 years in age, to stay until they fall naturally

Letter: 1723 (pg 31 DEIS) the rotations that you show will not provide the best cavity trees for the RCW because they are too short In addition you do not provide long enough rotations to have real OG for the various ecosystems

Issue: 5-2 Management for RCW

Response: Rotation ages are based on the best available information to supply a continuous supply of high quality RCW habitat in perpetuity 80 year rotations will ensure large areas of older forest without the risk of catastrophic events or SPB epidemics Potentially a significant number of trees that are much older than the stated rotation ages will be present throughout the HMA In TX, should the 80 year loblolly pine rotation for SPB considerations be implemented, all overstory trees will be left in perpetuity All clusters, recruitment and replacement stands will have no rotation established and would remain until they no longer provide suitable nesting habitat These stands will provide numerous stand sized (10 acres or larger) patches throughout the HMA that allows the older forest or relict tree characteristics to develop

Letter. 1604 The DEIS at p 86 claims that " large population groups more closely spaced are not adversely affected by even-aged regeneration of forest stands Examples are RCW populations on the Francis Marion, Kisatchie, and Appalachia National Forests " These studies were flawed See attached documents

Letter: 1605 The DEIS claims that " large population groups more closely spaced are not adversely affected by even-aged regeneration of forest stands Examples are RCW populations on the Francis Marion, Kisatchie, and Appalachia NFs " These studies were flawed

Response: The IDT disagrees Research and monitoring of RCW on these areas is extensive and definitive

Letter· 1605 The DEIS arbitrarily limits the RCW habitat in (alt 6 & 7) 212,824 acres and then would "leave sub-populations isolated between forested areas that are not managed according to RCW EIS standards RCW populations would expand to recovery levels, but probably not beyond that " In contrast, under alt 4B the RCW habitat (MA2) would be 338,637 acres "RCW population could expand beyond recovery objectives " This forces us to choose between (a) changing alt 6, (b) accepting the limits therein to RCW expansion, and (c) explaining away the DEIS premise that management according to EIS/RCW standards is better for RCW

Response: Choice far exceeds the three stated options These many choices are all part of the process established in the range of 9 alts detailed within the DEIS The FP and FEIS incorporate all changes made within the RCW EIS and have also reduced HMA (MA-2) acreage to respond to comments received from the public

Letter: 1604 The DEIS at p 88 fails to provide adequate research and data for its conclusive assertion that "In all alternatives, RCW within wilderness will be drawn out of that area through development of recruitment stands with artificial cavities outside the wilderness area boundary, providing better future management of these RCW and result in minimal RCW effects in wilderness " The commitment not to control Southern pine beetles nor to reduce or eliminate midstory in cavity clusters in wilderness is laudable, but not founded on research But the only experience in Texas is that RCW cavity clusters have survived in wilderness where left alone In Upland Island, the cavity clusters have doubled (from one to two)

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Response Documented RCW monitoring and research in TX and throughout the SE verify the difficulty in managing RCW habitat in wilderness

Letter· 1604 Since Alt 6 applies selection management in all commercial stands (MA-1), it would be best for RCW, provided that in general most selection cuts should leave a component of pines older than 100 years. Leaving more old pines permanently after each cut might lower the total timber production, but would better protect biodiversity, especially structural and vertical diversity

Letter: 1605 Since alt 6 applies selection management in all commercial stands (MA1), it would be best for RCW, provided that in general most selection cuts should leave a component of pines older than 100 years Leaving more old pines permanently after each cut might lower the total timber production, but would better protect biodiversity, especially structural and vertical diversity The DEIS fails to discuss this option adequately, as does the RCW/EIS

Response· MA-2 emphasizes habitat for RCW, MA-1 does not Age is not a criteria in management of uneven-aged stands, but rather the ratio of size classes within the stand It would be difficult to ensure a component of 100, yet trees in uneven-aged stands Both the RCW EIS and FEIS provide discussion on this issue

Issue· 5-2 Management for RCW

Letter. 1605 The DEIS asserts that more clearcutting would be necessary under alt 7 then alt 4B Actually, none would be necessary under Selection management is adaptable to restore native pine stands after catastrophies and even after planting to the non-native slash p.

Response: The FEIS has included additional information relative to clearcutting and pine restoration Though selection management can be used in restoration, costs are high, success is low and time required to achieve site "restoration" is much greater

Letter 1632 FS management must allow for more vertical stratification of wildlife habitat in RCW management areas Extensive midstory removal in RCW areas allows for only under-canopy and ground-level wildlife habitat

Letter: 1632 Initial habitat modifications for RCW have been pronounced and intrusive Pervasive clearing of mid and overstory hardwoods has resulted in the loss of significant opportunities for wildlife utilizing the vertical forest space between 5 and 50 ft above the forest floor A homogeneous stand of healthy pine trunks offers nothing for low to mid-level cavity dwellers (note comments under "Snags") The high degree of SPB "control" cutting, improvement thinnings, and hardwood removal truly restrict RCW clusters to woodpeckers and ground dwellers I urge the FS to refrain from further widespread modifications in HMAs until populations increase sufficiently to outgrow currently managed habitat.

Response: Management emphasis in MA-2 is to enhance RCW habitat Hardwood midstory control would be in cluster, replacement and recruitment stands exclusively The FP and RCW EIS contain allowances for a component of hardwoods in these sites and ensuring some "in stand" diversity

Letter· 1679 The map for alt 4b does not include all RCW colonies

Response: No active clusters were excluded from HMA's in alt's 2-8

Letter: 1723 (pg 73 DEIS) you seem to be concerned about suppressed longleaf pines using uneven-aged management in Alt 7 Yet the RCW prefers suppressed pines to make its cavity holes in This is what FS research has shown But you propose to manage to not have suppressed LLP This makes no sense

Letter· 1723 (pg 63 DEIS) competition and suppression of pines is good for RCW cavity trees your plan will eliminate these suppressed trees I object''

Response: The IDT disagrees, cavity trees for RCW have 3 consistent characteristics, old age, red heart fungus and minimum diameter These characteristics are not exclusive to suppressed pine trees

Letter 1808 the USFS may want to redesignate the RCW recovery population to a different National Forest (from Sam Houston NF)

Response: This can be discussed during consultation with USFWS

Issue: 5-3 *General*

Letter. 1605 SPB control methods in RCW colonies unwisely permit cutting of cavity trees If this is necessary, relocation plans of the colony should be a top priority If the objective of this plan is to stabilize and increase RCW populations, not a single bird is expendable

Response The RCW EIS prohibits the cutting of cavity trees (living or dead) in active and inactive clusters unless they pose a threat to public safety, or to protect the cluster, replacement or recruitment stand from insect attack The USFWS must be contacted and issue a concurrence before any cavity tree can be cut

Letter· 1612 are concerned that the plan is being driven by the management for a single species - the RCW In alt 4B, over 100,000 additional acres are being considered over and above the current plan The corridors are not necessary and give no background as to how they were determined, how wide effective corridors need to be, the cost reductions to counties and schools in reduced revenues due to reduced timber sales in the areas

Issue: 5-3 General

Response: HMA size in the selected alt has been reduced from 4B acreage Careful analysis by NFGT developed new HMA's for each forest that reflect realistic expansion by RCW during the 10-15 year life of this FP A three level approach to monitoring (implementation effectiveness and validation) will measure the success of silvicultural and other mgmt actions in HMA's as described in the monitoring of the FP to evaluate the success of RCW management actions

Letter: 1808 Language in the standards and guidelines for MA 1 and 2 need to be changed to reflect changes that will be made in the final EIS for management for RCW and its habitat on NFs in the southern Region

Response: The NFGT FP and EIS incorporate all modifications found in the Final RCW EIS and Implementation guides Analysis of alternatives did not change substantially the outputs or trends used in evaluation of the 9 original NFGT EIS alternatives

Letter: 1467 It has been suggested that ORV use can disrupt the reproductive cycle of the RCW If this is true, why do these birds continue to build nests along ORV trails?

Response: Disturbances by humans have proven to adversely impact reproductive success in many species Major disturbances such as construction or human activity will not be permitted in RCW clusters, especially during the nesting season RCW that excavate a cavity and move into existing facilities or trails would not be affected unless monitoring indicates an adverse effect on the RCW As populations of RCW expand, monitoring will take place that evaluates the cause and effect relationship of recreation use and RCW disturbance

Issue: 6 INTEGRATED PEST MANAGEMENT

Letter: 1603 The Final EIS should also discuss the long term forest health implications of each alt Under Alt 4b, inventory will build to excessively high levels, risking catastrophic damage and creating an unhealthy forest

Response: The EIS does discuss the forest health implications of the alternatives in Chapter III, Part I(a) Though under alternative 4b rotation age will be increased in some management areas, forest health risks will be minimized by using the IPM decision key to assist in management strategy and by restoring longleaf pine to its historic range

Issue: 6-1 Addressing SPB in the Forest Plan Revision

Letter 1453 SPB management cutting is given priority overwhelming all other management needs and public uses This overarching priority shows that the proposed Plan does not incorporate multiple uses as mandated under the MUSYA

Response: SPB control is given priority in most management areas in order to protect the pine resource which will help provide for multiple use and lead to sustained yield as mandated in the MUSYA SPB control is not given high priority in management areas where natural processes are the main focus, such as wilderness

Letter: 1256 to safeguard federal lands from excessive losses to bark beetles in the future will require periodic thinning of pine forests to reduce stand densities, timely harvesting and regeneration, and the ability to suppress beetle infestations while they are still small, regardless of where they occur Accordingly, Alt 3, coupled with prompt beetle control within existing wilderness areas, would seem to offer the preferred approach to managing the NFs in Texas for the benefit of all

Issue: 6-1 Addressing SPB in the Forest Plan Revision

Response. The NFGT plans to take an integrated approach to pest management, including hazard reduction and timely control However, lands have been allocated to various management areas which have different management emphases in response to public needs and concerns Accordingly, our pest management standards have been developed to provide the best protection and control tactics which also lead to the DFC for the MA High priority has been placed on protecting adjacent private lands, and safeguards have been added to the SPB control standards for each MA to achieve that protection

Letter: 1453 should not permit these SPB cuts and should promote more sustainable means of reducing SPB cycles and tree vulnerability, especially by increasing timber species diversity

Response The NFGT plans to reduce SPB hazard through thinning, restoring species to their historic ranges, and other silvicultural techniques However, prompt control of active, expanding SPB infestations is a necessary component of an effective IPM program

Letter: 1460 Since the SPB-EIS of Apr 1987 was not updated, the Draft EIS should be amended to address new SPB control methods New information available includes a) the Draft Plan includes provisions for use of verbenone and other "behavioral chemicals" after EPA approval obtained Without methods defined in an updated EIS, verbenone control measures cannot be used Note that verbenone WITHOUT cutting is preferred method b) use of natural predators c) use of new SPB "repellant" d) new silvicultural concept using increased hardwood component to reduce SPB hazard should be implemented

Letter 1605 the DEIS should be amended to address new SPB control methods a) provisions for use of verbenone and other "behavioral chemicals" Without methods defined in an updated EIS, verbenone control measures cannot be used b) Use of natural predators is commonly done for many agricultural crops use of natural SPB predators (especially clerid beetles) should be implemented c) Use of new SPB "repellant" should be implemented d) New silvicultural concept using increased hardwood component to reduce SPB hazard should be implemented

Response: After an indepth analysis in 1992 of new information and efficacy data, the FS concluded that there was not a need to supplement the FEIS for the SPB Research continues on using verbenone and other SPB inhibitors for suppression, and these behavioral chemicals still await EPA approval Once EPA approval is obtained, the FEIS will be supplemented to allow use of behavioral chemicals for SPB suppression The FP calls for leaving trees vacated by SPB, which will help maintain predator populations Ongoing research is examining the augmentation or supplementation of natural enemy populations, and viable tactics developed will be incorporated into our IPM program As yet there is no evidence that natural enemies can suppress infestations or prevent epidemics, though it has been suggested they may be in part responsible for SPB population declines As stated in the EIS, SPB hazard reduction is one of the primary components of the IPM program on NFGT

Letter: 1460 Language in draft plan provides for "attempts" to preserve hardwoods during SPB cut This should be a requirement, not a goal Hardwoods serve to reduce pine basal areas in a stand Therefore, mixed pine/hardwood stands should be favored over pure-pine monocultures for SPB hazard reduction An uneven age distribution of pines within a stand would serve to reduce pine basal area compared to mature, even-aged stands Single-tree selection management would produce age diversity within a stand and reduce SPB hazard

Response: A Forest-wide standard clearly states hardwoods are to be protected during SPB suppression treatments Hardwoods are only to be cut either to ensure the safety of crews or visitors or to allow for other planned, site-specific activities Trees are directionally felled to minimize damage to hardwoods Monitoring tasks have been added to evaluate hardwood protection An uneven age distribution in a stand will not reduce SPB hazard by itself, and pine BA is not always lower in such stands The goal of our IPM program is to reduce hazard to all pests while meeting the management objectives of the site

Letter: 1632 I am particularly opposed to salvage operations within SMZs, Special Management Areas, and Texas Natural Heritage sites When areas are classified as unsuitable for timber production, resource protection should be the primary management goal and SPB logging should not be allowed to degrade such resources

Issue 6-1 Addressing SPB in the Forest Plan Revision

Response: Resource protection is a primary management goal in most management areas, which is why prompt SPB suppression is important The large infestations which developed in wilderness illustrate the need and benefit of SPB suppression in other management areas Special standards for SPB suppression activities which help meet the management emphases were written for each management area For example, many infestations in SMZs are allowed to run their course, and cut and leave is recommended over cut and remove Just because an area is categorized as unsuitable for timber does not mean its pine component is not an important resource, as pines as well as other tree species have important values other than timber

Letter: 1632 in wilderness, infestations should be allowed to run their course to the greatest extent possible Stricter protection measures must be adopted in MA-1 and MA-2 to prevent re-occurrence of past soil and water problems

Response· Wilderness infestations are allowed to run their natural course except when adjacent private pine resources or high value Federal land is threatened

Letter· 1632 It is noteworthy that SPB has been particularly persistent in certain areas of the Forest While silvicultural conditions such as age and density are primarily used to rate SPB hazard, edaphic conditions are equally important I recommend that as part of the SPBIS or in separate research, the FS investigate the relationship between soil series and past SPB infestions Characteristics contributing to pine stress and subsequent SPB infestation include 10 high water table/woil saturation, 2) high salt levels/base saturation, 3) high clay content resulting in significant volumetric fluctuations in soils across a changing moisture gradient

Response: Research is ongoing examining the relationship between SPB infestation and tree stress, particularly in regard to water availability

Letter. 1723 I am particularily concerned about this document's total abdication to the SPB EIS that was finalized in 1986 Not only is this document obsolete, it failed to address all issues of concern when it came out It is very disappointing to see that this plan continues this ignoring of these important issues cutting for SPB seems to take precedence over every other forest value

Response: The need to supplement the SPB FEIS was evaluated in 1992, and it was determined the analyses were thorough, the treatments efficacious, and there was not enough new information to warrant a supplement The final report included a list of relevant papers on SPB published since the implementation of the SPB FEIS

Letter 1723 (pg 59, DEIS) you ignore the SPB control damage that occurs when you scrape off bark of trees etc . you do not address these problems and they are not addressed site specifically because you do not have to do a site specific EA, they are not addressed in the SPB EIS and they are not addressed in the EA for the different TX NFs

Letter: 1723 (pg 60, DEIS) disturbance factors for timber harvest also apply to SPB cuts and that the damage to trees in SPB cuts is high

Response: The impacts of SPB suppression activities are discussed in the Environmental Consequences section of the FEIS for the Suppression of the SPB

Letter 1627 Alternative provides a reasonable approach to control of SPB Adding no new wilderness areas will be a positive step in pest management

Letter: 1723 (MA-8a-41) against which allows cutting for insects and disease

Letter: 1723 (MA-8c-41-44) I am opposed to these You are using this as an excuse to increase timber production No tree should be allowed to be hauled out of a special management area

Issue: 6-1 *Addressing SPB in the Forest Plan Revision*

Response: Comment noted

Letter: 1755 Pine beetle damage and destruction to the NF has been tremendous and by being unharvested has cost the public thousands or millions of dollars Also, the forest land that ajoins private property not only destroys the NF timber but also the private owner's timber

Response: The NFGT continues to implement prompt control of SPB infestations, and records indicate that the response time between spot detection and treatment is shorter or equal to response times on private land Cut and remove is the preferred treatment on a majority of NF land, and is implemented whenever conditions allow Highest priority has been given to protecting adjacent private land from SPB infestations initiated on NF lands All special management areas have provisions allowing SPB suppression whenever pine resources on adjacent private land are threatened

Letter: 1767 The USFS land has the oldest age timber stand which is very susceptible to a large SPB problem within itself, so do not add to that Also, please budget for SPB control at the highest rate possible

Response: In response to biological and social concerns, rotation ages for pines have been extended in some management areas The NFGT will use available silvicultural techniques to reduce SPB hazard in these areas The NFGT has an excellent record of obtaining SPB suppression dollars, and will continue to request funding at a level necessary to provide prompt detection and control, as well as continued monitoring

Letter: 858 The FS is handling SPB by the best and really only method, cutting and clearing the affected pines as quickly as possible the record shows over and over that quick action by cutting and clearing a bug spot is the only stopping answer, after chemical treatments have failed

Response: The IDT appreciates your support

Issue: 6-2 SPB Control Measures

Letter: 1679 The Draft FP does not reflect any current research on SPB management Verbenone without cutting should be the preferred method The Draft FP addresses control not prevention Preventing SPB is best done using natural SPB predators The forest should be a complete ecosystem with an increased hardwood component, and SPB resistant species of pine Mixed hardwood/pine stands should be favored Uneven age cuts should be preferred to reduce pine basal area Pure pine stands are not an ecosystem The Draft FP relies too much on buffer cuts There is no research or documentation showing that buffer cuts work If buffer cuts are used, no hardwoods should be cut within the buffers There should be no even age cuts for type conversion to reduce SPB hazard The Draft FP does not address the use of SPB repellent. The Draft FP allows Verbenone and other behavioral chemicals only after EPA approval, but without an updated EIS they can't be used

Response: After an indepth analysis in 1992 of new information and efficacy data, the FS concluded that there was not a need to supplement the FEIS for the SPB Research continues on using verbenone and other SPB inhibitors for suppression, and these behavioral chemicals still await EPA approval Once EPA approval is obtained, the FEIS will be supplemented to allow use of behavioral chemicals for SPB suppression The FP calls for leaving trees vacated by SPB, which will help maintain predator populations Ongoing research is examining the augmentation or supplementation of natural enemy populations, and viable tactics developed will be incorporated into our IPM program As yet there is no evidence that natural enemies can suppress infestations or prevent epidemics, though it has been suggested they may be in part responsible for SPB population declines As stated in the EIS, SPB hazard reduction is one of the primary components of the IPM program on NFGT

Letter: 1409 The SPB needs to be controlled quickly by what ever means seems best for the situation I have worked with the FS on corridors and they did not work out very well One where the trail ran along the stream, we taped off to try to save as is, but the beetle did not know it was a special area and killed all the trees This made a bigger problem than if it had been taken care of early

Issue: 6-2 SPB Control Measures

Letter: 1636 I favor no use of perticides to control SPB
Letter: 1723 I am against MA-8b-42 and 43 No poisons must be used in the floodplain
Letter: 1723 (Scenic Areas) I am opposed to SPB control in these areas.
Letter: 1723 MA-8d-05 - I am totally against control for SPB because this disrupts the natural evolutionary processes
Letter: 1723 MA-8d-42-43 - I am against (SPB control) because this disrupts the natural evolutionary processes
Letter: 1723 MA-8e-06 - I totally oppose SPB cutting of any kind
Letter: 1723 MA-8f-21, 31, 32 - No SPB cutting must be allowed
Letter: 1723 (MA-4-41-44) I am against any SPB control in riparian areas
Letter: 1723 (FW-075) I approve of the use of pheromones in sensitive area but with no cutting and if cutting is done then no logging or removing from the area
Letter: 1723 I do not support your present SPB control program at all

Response: Comment noted

Letter: 118 buffer cutting, and cut and leave strategies have not proved effective, expediting EPA approval of pheremone pocket treatment seems a worthwile avenue to pursue further
Letter: 1310 Get to work on getting EPA approval for operational use of verbenone
Letter: 1604 Issue After a decade of successful results of applying verbenone to pine stands to repel SPB, how much longer does the Forest Service intend to continue experimental application before getting around to obtaining a permit for more general use from the Environmental Protection Agency?

Response. Suppression methods for SPB infestations are efficacious and greatly reduce losses According to SPBIS data compiled in 1992, 96% of all infestations in the Southern Region were controlled with one treatment, while in Texas the figure was 90% Most breakouts were controlled with only one additional treatment The FS continues to press the EPA for registration of verbenone

Letter 354 Verbenone without cutting should be considered the primary SPB treatment in RCW colonies and immediate surroundings Cutting cavity trees for SPB "control" is unacceptable!
Letter 1460 Verbenone without cutting should be the top priority control method for RCW colony and foraging habitat areas SPB control methods in RCW colonies permit cutting of cavity trees When this is necessary, relocation of the colony should be a top priority If the objective of this plan is to stabilize and increase RCW populations, not a single bird is expendable
Letter. 1604 Recommendation Apply for a permit and use verbenone to protect key pine stands from SPB, especially RCW cavity trees
Letter. 1605 Verbenone without cutting should be the top priority control method for RCW colony and foraging habitat areas

Response: Verbenone or other SPB inhibitors will probably be the treatment method of choice once EPA registration is complete The NFGT has been working with the TFS to test verbenone for RCW cavity tree protection, and we have and are experimentally treating trees in clusters to prevent SPB attack and avoid loss of cavity trees Cavity trees are almost never cut for SPB control The only situation in which infested cavity trees are felled is when nearby cavity trees are threatened and the bird has abandoned the tree

Letter: 372 Never cut (SPB trees) wilderness, SMZ, or hiking trails Don't cut beyond infected area buffers
Letter 387 Hiking trails, wilderness areas & SMZ's should not be subject to SPB control - leave them as is!!
Letter. 414 Also these zones (SMZ's & hiking trail corridors) should not be managed for the SPB
Letter: 858 if a bug spot (SPB) attacks inside the (LSHT) corridors, what will be the action? Records show over and over that quick action by cutting and clearing a bug spot, if chemical treatment fails, is the only stopping answer I do not want delayed action or in-action that lets the SPB kill pines inside (run down) the corridor, like happened in the Wilderness
Letter: 1605 Recommendation No trees are cut within SMZ's for SPB control Pheremones may be used
Letter: 1605 SPB control in sensitive areas should be limited to the use of the pheremone verbenone

Issue. 6-2 SPB Control Measures

Letter: 1608 Don't do SPB treatments in wilderness areas, SMZ or on hiking trails and never cut beyond the infected area at any time In the long term, the best solution to the SPB problem will be the restoration of longleaf pine

Response: Trees are only cut in wilderness to protect pines on adjacent private land or high value federal land, and to protect habitat for endangered species Treatment in SMZs is also limited, as detailed in standard MA-4-42. Behavioral chemicals will be used operationally in wilderness and SMZs once they are registered and techniques are refined. Infested pines along hiking trails will soon die and create a hazard to hikers Felling these trees while infested both suppresses the spot and removes the potential hazard Prompt control will limit the impacts of SPB near the trails

Letter: 991 We continue to be opposed to the no action policy on southern pine beetles (SPB) unless within 1/4 mile of susceptible host type on private lands or high value federal lands We firmly believe that prompt control of all rapidly expanding infestations is the only realistic protection for adjacent private lands. Allowing very large SPB populations to build up in wilderness areas exposes private timber growers for miles all around the wilderness areas to signifcant financial losses and is very irresponsible for public land managers

Response It is difficult to balance the public's need for wilderness with the protection of pines on adjacent private land, but the 1/4 mile control zone gives the FS some room to suppress SPB while allowing natural processes to act in the remainder of the wilderness While some infestations have impacted adjacent private land, there is no evidence yet that large wilderness SPB populations have affected wide areas Epidemic conditions were already well established in surrounding areas before the large infestations developed, and spot numbers and acreage infested actually declined at the time of the great increases in wilderness spot size

Letter: 1310 Stop creating pine monocultures Start managing for more hardwoods Manage for mixed stands. Manage for lots of old growth areas spread throughout the forest, to provide good habitat for the various species of woodpeckers that prey on and control endemic populations of SPB

Response: The HMAs should provide excellent habitat for woodpeckers Though woodpeckers feed on SPB and often appear to significantly impact population numbers, there is unfortunately no evidence that woodpeckers are able to prevent the onset of SPB epidemics

Letter: 1310 Stop the practice of buffer cutting that eliminates pines having a resistance to SPB

Response: No pines appear to be completely resistant to SPB, but they may vary in susceptibility Once an infestation is established and expanding, no pines are immune The buffer strip should only remove pines which would be infested and die if the spot were left uncontrolled

Letter. 1460 Use of buffer strips during cut/remove and cut/leave operations should be eliminated Buffer strips result in more trees than necessary being cut If just presently infected trees are cut, and even if a "breakout" occurs, SPB population densities are known to be drastically reduced Even if newly affected trees are subsequently cut, fewer trees would be lost than if the buffer strip of healthy trees is cut.

Letter: 1605 If cutting is implemented, the use of buffer strips during cut/remove and cut/leave should be eliminated Buffer strips result in more trees than necessary being cut If just presently infected trees are cut, and even if a "breakout" occurs, SPB population densities are known to be drastically reduced Even if newly affected trees are subsequently cut, fewer trees would be lost than if the buffer strip of healthy trees is cut

Response: Buffer strips are necessary for effective spot suppression as they remove suitable hosts from the area of attraction Breakouts would be common if buffer strips were not used, and extra time, manpower, and money would be required to retreat the infestation It is better to get it right the first time The size of the buffer strip should be adjusted according to spot size and activity, thus minimizing the number of uninfested trees treated Buffer strips only impact pines which would be infested if the spot were not treated

Letter: 1604 The DEIS at p 38 (58?) presumes the continuation of the current buffercutting approach, without ever analyzing the non-felling alternative or mentioning any logical and scientific reasoning for changing that approach The DEIS refers to the 1987 . FEIS on SPB, but fails to set forth any of the research or reasoning since 1987, nor to explain the paucity of Forest Service research, before and since 1987 on the key issues involved (in contrast with the concentration of research on perpetuating tree-felling)

Issue: 6-2 SPB Control Measures

Response: The section detailing the environmental consequences of treatment options by alternative has been expanded A majority of FS research since 1987 has been aimed at finding new alternatives for bark beetle control, particularly methods utilizing behavioral chemicals

Letter: 1604 Issue: Since the emission of alpha-pinenes (turpentine odor) from felled or damaged pines combines synergistically with the attractant phermones that SPB emit when infesting trees, does not the buffercutting of pines in or near SPB infestations result in attraction of even more SPB's to the adjoining stand intended to be saved?

Response: The alpha-pinene released from the entrance holes bored by the SPB combined with their release of attractants creates an area of attraction around the spot "head" A buffer strip is required to remove the suitable hosts from this area and disperse any remaining SPB Felling a buffer strip helps protect the adjoining stand

Letter: 1604 Issue To what extext does the buffercutting of pines result in denser future pine stands because of the increase in exposure to sunlight resulting from such buffercutting?

Letter. 1604 Issue How heavy is the damage to existing hardwoods caused by buffercutting, thus vastly reducing the hardwoods?

Response: These subjects have now been addressed in the EIS

Letter: 1604 Issue The failure of buffercutting in wildernesses to achieve a success ratio better than 30% in "protecting" susceptible adjoining private pines for SPB

Response: The 30% figure is erroneous Eighteen spots have been treated in wilderness to protect private land, and ten spots have crossed over Several of these spots crossed over before treatment was implemented It is very difficult to suppress a very large SPB infestation, and many wilderness infestations are 10 or more acres in size Our suppression activities on small spots were all successful, and all but one treatment on large infestations were successful in either preventing or limiting impacts on adjacent private land

Letter: 1604 Issue The extent of beneficial results of thinning, particularly under selection management, in reducing infestation by SPB

Response: Thinning is beneficial, and the IPM decision key will be used to recommend thinning and other silvilcultural techniques to reduce SPB hazard

Letter: 1310 Recommendation No trees are cut within SMZ's for SPB control Pheremones may be used
Letter: 1604 Recommendation Cease buffercutting, or any form of tree-felling, or pesticide application, anywhere
Letter: 1604 Recommendation Cease such practices (tree-felling and pesticide application) particularly in wildernesses and special areas

Response Recommendation noted

Letter: 1604 Issue The DBIS at p 58, claims to favor Integrated Pest Management, but focuses mainly on the use of pesticides and mechanisms such as felling which fails to analyze or to justify a truly integrated approach

Response Silvicultural techniques to reduce susceptibility are also discussed

Letter: 1604 Recommendation Provide assistance to adjoining private landowners to avoid damage from SPB

Response: The USFS, along with the TFS, provides technical help to adjacent private landowners in prevention of SPB impacts We are sure they would welcome any monetary contributions from private groups concerned with wilderness issues

Letter. 1604 Issue The failure of buffercutting to protect Red-cockaded woodpecker cavity trees, especially from the single-tree infestation of overwintering SPB

Issue: 6-2 SPB Control Measures

Response: Buffer strips are rarely used in RCW clusters as the spots are usually detected quickly and the pine BA is low, so generally only the infested trees are treated Spot suppression treatments using buffer strips are designed to prevent further spot expansion and limit losses in that area, not to prevent the attack of individual trees by dispersing SPB The suppression techniques are very successful in accomplishing their purpose The use of behavioral chemicals may hold promise in protecting against infestation of high-value, individual trees.

Letter: 1604 Issue The failure of buffercutting to achieve the success ratio (95%) necessary to control SPB infestations

Response: The two suppression techniques requiring buffer strips have been very successful in controlling SPB infestations In the Southern Region, 97% of spots treated with cut and remove were suppressed with one treatment, while the figure for cut and leave was 90% In Texas, the figures are 96% for cut and remove and 85% for cut and leave Most breakouts were controlled with a single additional treatment There is no magic figure necessary to control SPB outbreaks Outbreaks occur despite our efforts, but SPB suppression greatly reduces impacts, as evidenced by comparing pine losses in wilderness with losses in general forest

Letter· 1632 The FS should abandon stand regeneration as a method of reducing SPB susceptibility More recent studies cite density over age in SPB hazard The degree of SPB infestations in dense plantations reflects this on the the forest Instead, the FS should rely on lowering of pine density within stands through thinning or uneven-aged managment SPB cutting must be scrutinized for the essentailly unregulated impacts that it causes and appropriate offsetting measures must be taken to protect soil and water

Letter: 1633 The most widely agreed upon and most successful method of SPB control is reducing the density of pines by both reducing pine basal area and reestablishment of pine-hardwood forests the section of the Plan (IPM) never directly discusses this method One approach which is not mentioned but which should be considered is the use of bio-remediation

Response: Stands are not regenerated solely for SPB hazard reduction The need to regenerate a stand is determined by the management objectives of the area Reducing pine density is a recommended method of SPB hazard reduction, and such silvicultural decisions are guided by the IPM decision key Silvicultural techniques are discussed in the IPM section of the EIS

Letter: 1640 Leaving the affected trees standing provides wildlife food and nesting cavities

Letter: 1679 Trees should not be cut in RCW habitat for SPB control

Response. Vacated trees are to be left for wildlife needs and SPB natural enemy maintenance Leaving infested trees will generally lead to additional tree loss, including potential RCW cavity trees Proven and approved treatment techniques such as cut and leave are often required to protect RCW clusters and foraging habitat

Letter: 1679 In wilderness let nature follow its course There should be no cutting in wilderness, especially for SPB control If private land is threatened by SPB on public land, the FS is not responsible if the private land owner did not minimize the SPB hazard on the private property

Response: Most infestations in wilderness are allowed to run their natural course Control is sometimes necessary to protect adjacent private land Experience has shown that even stands rated as low SPB hazard are severely impacted by large SPB infestations, such as those which develop in wilderness Adjacent landowners have their own management objectives for pines, which can include wildlife habitat, timber production, or old growth It is not FS policy to disrupt their land management through our actions or inaction

Letter. 1723 (FW-072) is too vague silvicultural strategies are approved?

Response: All silvicultural strategies are described by the SAF and documented in the EIS

Issue: 6-3 General

Letter: 1605 Language in draft plan provides for attempts to preserve hardwoods during SPB cuts This should be a requirement, not a goal

Issue: 6-3 General

Response: A Forest-wide standard clearly states hardwoods are to be protected during SPB suppression treatments Hardwoods are only to be cut either to ensure the safety of crews or visitors or to allow for other planned, site-specific activities Trees are directionally felled to minimize damage to hardwoods Monitoring tasks have been added to evaluate hardwood protection An uneven age distribution in a stand will not reduce SPB hazard by itself, and pine BA is not always lower in such stands. The goal of our IPM program is to reduce hazard to all pests while meeting the management objectives of the site

Letter: 1256 I am particularly concerned about the adverse effects alts 6 and 7 would have on the health of the NFs in Texas The combination of doubling acreage in old growth and adding to 6-7 more wilderness areas will predispose the NFs in Texas even more than they are now to infestations of the SPB
Letter: 1723 (pg 239 DEIS) in my view SPB cutting is not an "ecologically acceptable" form of pest management and therefore should not be used
Letter: 1723 (MA-8a-43[44] Remove "as appropriate" under 43 and let the public participate fully
Letter: 1723 MA-8d-B2 - no cutting for SPB must be permitted This will destroy the beeches you are supposed to protect and damage or kill other hardwoods
Letter: 1723 Eliminate MA-9b-51

Response: Comment noted

Letter 990 Obtain the right to fight beetles in Wilderness Areas
Letter: 1619 Must increase SPB - This suppression should become more aggressive in the wilderness areas

Response: It is difficult to balance the public's need for wilderness with the protection of pines on adjacent private land, but the 1/4 mile control zone gives the FS some room to suppress SPB while allowing natural processes to act in the remainder of the wilderness. While some infestations have impacted adjacent private land, there is no evidence yet that large wilderness SPB populations have affected wide areas Epidemic conditions were already well established in surrounding areas before the large infestations developed, and spot numbers and acreage infested actually declined at the time of the great increases in wilderness spot size

Letter: 1632 For other areas suitable for timber management, concentrate on thinning for reduced SPB hazard and preparation for uneven-aged management

Response: Thinning is beneficial, and the IPM decision key will be used to recommend thinning and other silvilcultural techniques to reduce SPB hazard

Letter: 1605 Pure-pine stands/plantations are NOT an ecosystem, but if they were, SPBs would be an integral part of the natural balance The FS is deluding itself and the public by considering SPBs controllable, especially at epidemic population levels

Response: SPB is a part of natural ecosystems in the southern US, and SPB and pines have co-evolved. The FS is not attempting to control all SPB or prevent epidemics The FS is reducing impacts of SPB by reducing SPB hazard and by promptly controlling infestations

Letter: 1632 salvage to seek out and cut small infestations of all types of bark beetles is dramatically affecting snag structure on the forest Leaving smaller infestations uncut forest wide would be a start, and excluding cutting in Special Managment Areas and SMZs would be a real improvement over the current situation

Response: Many small infestations are inactive when ground-checked, or are predicted to go inactive These infestations are generally not salvaged, creating snags Vacated trees in SPB spots are also left standing during control operations in a majority of instances

Letter: 1670 Be concerned about fireants and start a program to eradicate them Clearcuts encourage colony formation

Issue 6-3 General

Response· Fire ants are well established and an eradication program would prove futile Fire ants are generally a problem for residential and agricultural areas

Letter: 1723 (pg 104, DEIS) you do not acknowledge that beetles can attack pines that are inside of wilderness areas with the beetles originating from outside the wilderness You need to discuss how many spots have started outside of wilderness and come inside the wilderness as well as how many have done the opposite you contradict yourself here by saying first that 1/3 of the pine stands have been killed in Turkey Hill Wilderness Area but then saying that 3/4 have been killed Which is the correct figure Regardless the SPB hazard from wilderness areas is much lower today that it was 10 yrs ago when wilderness was established because there are fewer dense stands of pine in wilderness because the SPB has done what it is supposed to do, naturally thin the pines

Response: Of course infestations may move from outside the wilderness onto wilderness, and this has occurred at least twice The FS works with the TFS to monitor the areas surrounding wilderness This topic was not discussed in the DEIS because it was never identified as an issue or concern in any of our scoping Infestations moving onto wilderness from private land would be considered part of the natural process in wilderness The environmental consequences section of the EIS has been revised The SPB hazard in wilderness has been greatly reduced This reduction was not due to natural thinning of pines by SPB, but rather by the elimination of most pines by SPB, except young regeneration

Letter: 1723 (pg 58) what research do you have that fragmentation is a problem "primarily if spots exceed 10 acres in size"?

Response: That phrase has been eliminated.

Letter: 1723 (MA-9b-89) This duplicates MA-9b-51

Response: Thank you for bringing this to our attention

Letter: 1723 (MA-9a-51) define hazard tree surveys
Letter: 1723 (MA-9b-51) what is a hazard tree survey? I am against using this as an excuse to log

Response: Hazard tree surveys are surveys taken in high recreation use areas to determine hazardous conditions to the recreationist(s) Actions taken as a result include pruning of dead branches, etc

Letter: 1723 (FW-071) what is an IPM Decision Key? You need to fully explain this and tell how it will prevent the destruction of residual trees during SPB control efforts

Response. A computer program used by prescriptionists to predict areas where potential pest problems may occur and gives silvicultural alternatives to reduce impacts

Issue: 7 ROADS AND TRAILS

Issue: 7-1 Road access in the Forest

Letter: 1310 Recommendation No new bridges, dams, culverts, ponds or dips may be constructed

Response: Recommendation noted

Issue: 7-1 Road access in the Forest

Letter· 1310 Road mileage does not vary significantly between alts in the DEIS, even though choice of a silvicultural system affects the necessary density of roads

Letter 1723 (pg 129, DEIS) you stated that Alt 6 & 7 needed more roads But you indicate in this table that they are among the lowest alternatives for reconstructed roads It makes no sense to say that these alternatives will have more soil and water impacts when they have fewer roads

Response The miles of road to be reconstructed on any given area is based on a uniform set of coefficients for each area applied to all alternatives and does not significantly vary within that area The timing of this activity will, however, vary based on the acres accessed and the time frame each area is first entered in response to specific resource activity The total miles of road reconstructed will vary only because of the differences in acres available and suitable for resource activities in each alternative

Letter 1310 There are too many roads on the NFT already Not one more mile should be built Private enterprises operate their timberlands with a fraction of the roads that are built on the NF This excess of roads is due to bureaucratic imperatives, not to any real need

Letter. 1605 Recommendation No new roads are needed Additional roads would further fragment forest areas and be detrimental to wildlife

Letter. 1605 No new roads should be developed for recreation

Letter: 1605 The draft plan calls for too many roads We would like to see selection management used for harvesting timber and low impact "forest roads" used to extract the timber There is no need to build permanent all weather roads for a one time harvest Roads should then be closed and will quickly re-seed and revert to timber production You are wasting a lot of potential timber area with unnecessary, extravagant roads

Letter: 1723 (MA-3-23) I am opposed to allowing public access to every isolated tract This means more roads which means more fragmentation of habitat There is too little roadless grassland and this is a precious resource that should be protected and not opened up Very rarely do you ever think about grasslands being solitude and quiet but they do We need some isolated areas where people can walk and have solitude and quiet These are endangered areas and must be protected

Letter 1723 (pg 126, DEIS) it is of great concern to me that the NF apparently places greater value on pleasing local landowners than protecting the NF from road fragmentation

Response With State, County, and FS routes, a transportation system is in place that meets access needs into most areas of the Forest This system will, however, require some reconstruction to meet expected use needs with the majority of the reconstruction involving minor work as defined in EIS Chapter III, Part II(a) utilizing existing routes The FS road system must meet not only the access needs for resource production, but must also provide access for a wide variety of other uses and needs including recreation, mineral exploration, special uses as well as taking into consideration the mobility needs of people with disabilities

Letter 1310 Excessive road density causes unacceptable levels of erosion, reduces the area available for forest growth, facilitates poaching and trash dumping, and degrades the wildlife habitat of the forest Roads are bad for wild turkey and for tropical songbirds Roads provide openings that attract cowbirds, which parasitize the nests of songbirds

Response Site specific analysis allows the placement of restrictions on any travel route or area for all or part of any time period in response to a variety of management and resource needs and objectives Specific direction is contained in Forest-wide S&G With use restrictions and closures, the open road density can be effectively reduced to meet management and resource needs and objectives All restrictions are applied in accordance with 36 CFR 261

Letter 1671 Under the current documentation, the mileage breakdown of temporary vs permanent roads and new contruction vs old is not clearly defined Without these figues, it is hard to determine what the cumulative impacts will be ORV trails placed too close to a bog could negatively impact the hydrology of the bog, while roads placed near RCW cluster sites could negatively affect the success of nesting during the spring roads have a definite negative impact on snake populations, as observed by the canebrake study conducted by the SFES Perhaps maps should be developed and made available for our review to better assess the impacts of roads to be upgraded If this is not feasible, could road maps be included in the project plans so that they can be evaluated on a case-by-case basis? Where uneven age management is applied, measures should be taken to plan and minimize the amount of entries and number of roads into units

Letter. 1679 Roads should be planned for minimal impact Big roads take forest floor out of the watershed They cause increased water yield and increase the amount of erosion and silting Roads should not be relocated to reach timber

Issue: 7-1 Road access in the Forest

Response: Access needs for any given area are based on a site-specific analysis taking into account a variety of resource needs, constraints, and environmental factors as outlined in the S&G for the appropriate MAs TSL, reconstruction needs, mitigating measures, and locations for all transportation facilities are determined at that time Most reconstruction work will involve minor reconstruction as defined in EIS Chapter III, Part II(a), utilizing existing routes with Forest-wide S&G applied to minimize effects on the resources

Letter: 1808 Part II(a), Operation and Maintenance of Roads, Environmental Consequences of the Alternatives (Road Development), p 128-130 This section of the DEIS does not specify what the actual density (per acre or square mile) and location of roads are on the NF in Texas The USFS in Texas has stated that they plan to map these roads when their GIS for this project is installed The DEIS should state that this activity is planned and that the information will be available to Federal and State agencies and the private sector. The DEIS does not include all impacts to the environment from road reconstruction and construction, only impacts to soil and water It is recommended that the EIS address the impacts of roads fragmented throughout the forest ecosystems

Response As the FS implements GIS, decisions as to what information will be made available and at what locations will be be made and public notification made Access to any given area is based on a site specific analysis and includes State, County, and FS routes

Letter: 1679 The Draft FP accounting for roads is questionable Roads are counted as an expense in the current cut This is not correct according to generally accepted accounting practices Roads constructed now should be an expense of the future harvest The Draft FP calls for too many roads, and the roads are too elaborate and expensive

Response: "Purchase Credit" earned, road construction is considered as an expense against the revenue received from timber, but the cost of the road construction (capital investment) is also depreciated as an expense in the future

Letter: 1175 Charge for having to build roads for lumber companies

Response Roads constructed for a timber sale are charged to that sale

Issue: 7-1-1 Road construction/reconstruction

Letter: 1310 Allowing new bridges or culverts over any stream is not justifiable. Just as there is no need for a single mile of new or so-called "reconstructed" roads in the National Forest
Letter: 1723 (MA-8b-21) removed and replaced with a standard that is measureable
Letter· 1723 (MA-4-22) stream crossings "must be" not should be, constructed at right angles to the stream
Letter 1723 (MA-4-24) the bridge approach "will be" not should be constructed to prevent erosion
Letter· 1723 MA-2-12 - I am against roads focused on commodity production needs

Response: Comment noted

Letter: 1310 Recommendation The culvert bridge on FR326A crossing Boykin Creek will be removed and the streambank recontoured and revegetated to its natural state Other bridges, culverts and dips on the Forest will be evaluated for retention or removal

Response Recommendation noted

Issue: 7-1-1 Road construction/reconstruction

Letter. 1723 The woods roads used in selection management are smaller and less prone to erosion because they can be put to bed immediately after use James Baker told me selection management had fewer roads than even age mangement It make no sense to say that "miles of roads to be reconstructed does not vary significantly between alternatives" when the highest alternative has 933 miles of roads versus 505 miles of roads for the lowest alternative

Response: The miles of road to be reconstructed on any given area is based on a uniform set of coefficients for each area applied to all alternatives and does not significantly vary within that area The timing of this activity will, however, vary based on the acres accessed and the time frame each area is first entered in response to specific resource activity The total miles of road reconstructed will vary only because of the differences in acres available and suitable for resource activities in each alternative

Letter: 1258 We should be closing off roads, not building them'
Letter: 1392 Texas voters are tired of unneeded expensive roads
Letter: 1451 Let's provide less access by way of the over-built roads and bridges
Letter: 1605 The EIS does not document why you need such "good" roads for timber harvesting Your roads are much better than the roads used on private land Why do you plan to build these roads? Where is your research explaining the need for spending so much money?
Letter: 1626 I am opposed to the construction of any new roads through the forests for either mining, drilling or timber cutting
Letter: 1636 Why should there be ANY new roads built in NFGT? Ask yourself this question "If we built no new roads this year would we still meet our MAIN objectives?" If the answer is "yes" then don't build them.
Letter. 1640 How many miles of new roads will there be and what will be the impact on fish and wildlife because of the new forest edges and forest fragmentation needs to be specified
Letter 1659 I would be opposed to any new roads in the N F , as the Forest is fragmented enough, and roads encourage poaching, dumping, and disrupt wildlife habitat The quality of the forest will deteriorate with further vehicular intrusion
Letter: 1679 The Draft FP has too many roads, and the roads are too big and extravagant There is no research or documentation for the number of roads, or why such big all weather roads are needed Single tree selection management should be used, and small "forest roads" should be used for the cut, then closed to re-seed naturally
Letter· 1679 The Draft FP creates too many roads and opens up too much of the forest This will increase the risk of manmade fires and make the forest accessible for illegal activities like poaching, dumping and growing illegal drugs
Letter: 1723 (pg 25, DEIS Summary) I am against the building of any more new roads in the NF and Grasslands

Response: With State, County, and FS routes, a transportation system is in place that meets access needs into most areas of the Forest This system will, however, require some reconstruction to meet expected use needs with the majority of the reconstruction involving minor work as defined in EIS Chapter III, Part II(a) utilizing existing routes The FS road system must meet not only the access needs for resource production, but must also provide access for a wide variety of other uses and needs including recreation, mineral exploration, special uses as well as taking into consideration the mobility needs of people with disabilities

Letter· 1679 The number of roads suggested in the Draft FP will increase the fragmentaion of the forest, threatening species that need forest interior habitat Existing roads should be closed or removed where they are not needed

Response· Site specific analysis allows the placement of restrictions on any travel route or area for all or part of any time period in response to a variety of management and resource needs and objectives Specific direction is contained in Forest-wide S&G With use restrictions and closures, the open road density can be effectively reduced to meet management and resource needs and objectives All restrictions are applied in accordance with 36 CFR 261

Letter· 1605 Allowing new bridges or culverts over any stream is not justifiable Just as there is no need for a single mile of new or so-called "reconstructed" roads in the National Forests of Texas
Letter: 1605 road construction has serious impacts on wildlife and can cause erosion which may impact the forest's future
Letter: 1605 The road density you are planning is too extreme The road density you plan will have devastating effects on many forms of wildlife, fragmenting populations of species that are dependent on interior habitat or are unwilling to cross open areas even as small as a few meters Evidence from studies suggests that roads are incompatible with the preservation of intact ecosystems
Letter· 1605 Roads should not be relocated without documenting a serious need for a change in location

Issue: 7-1-1 Road construction/reconstruction

Letter: 1605 The Draft Forest Plan proposes too many bridges and culverts Temporary roads should be used instead of all weather permanent roads Bridges make it easier to access remote parts of the forest Bridges impact the stream flow, and disrupt streamside ecosystems including the destruction of streamside habitat

Letter. 1723 (pg 128, DEIS) reconstruction will continue to harden the NF and make permanent fragmentation where now the fragmentation could be restored by plowing up the road

Response: Access needs for any given area are based on a site-specific analysis taking into account a variety of resource needs, constraints, and environmental factors as outlined in the S&G for the appropriate MAs TSL, reconstruction needs, mitigating measures, and locations for all transportation facilities are determined at that time Most reconstruction work will involve minor reconstruction as defined in EIS Chapter III, Part II(a), utilizing existing routes with Forest-wide S&G applied to minimize effects on the resources

Letter. 1310 There was no discussion in the EIS of the removal of unneeded and in some cases illegal bridges over Forest streams FS bridge on FR326A, crossing Boykin Creek in the Angelina NF . is illegal because it was constructed with no public input or even any notice to the public, in gross violation of federal laws and regulations

Letter: 1605 There was no discussion in the EIS of the removal of unneeded and in some cases illegal bridges over Forest streams FS bridge on FR326A, crossing Boykin Creek in the Angelina NF is illegal because it was constructed with no public input or even any notice to the public, in gross violation of federal laws and regualtions (bridge on FR326A, crossing Boykin Creek in the Angelina NF)

Letter: 1605 The culvert bridge on FR326A crossing Boykin Creek will be removed and the streambank recontoured and revegetated to its natural state Other bridges, culverts, and dips on the Forest will be evaluated for retention or removal

Response: Stream crossings are designed and constructed in accordance with accepted engineering and hydrologic standards and fully documented following appropriate procedures for the time frame invloved

Letter: 1453 I urge no construction of additional trails or roads

Response: Access into any given area, both road and trail, is based on a site specific analysis taking into account a variety of resource needs and objectives.

Issue: 7-1-2 Road Density

Letter: 1310 The DEIS does not properly assess the negative effects of such road densities

Letter: 1723 MA-2-13 - you have no road density limits You need this to protect wildlife and you need them in this document or else you do not have real standards

Response: Site specific analysis allows the placement of restrictions on any travel route or area for all or part of any time period in response to a variety of management and resource needs and objectives Specific direction is contained in Forest-wide S&G With use restrictions and closures, the open road density can be effectively reduced to meet management and resource needs and objectives. All restrictions are applied in accordance with 36 CFR 261

Issue: 7-2 Road maintenance

Letter: 1409 Both roads needed to be maintained at a desirable level to serve their purpose New construction needs to be carefully considered

Response: Road maintenance activities are planned, scheduled and accomplished yearly to respond to the level of service for each transportation facility within funding limits available for that purpose Reconstruction is planned only when routine maintenance will not provide for the expected travel use needs

Issue: 7-2 Road maintenance

Letter: 1723 The idea that on pg 129 (DEIS) that mowing make the roads function as linear wildlife openings must be challenged only certain wildlife are attracted to the plants that grow along roads pesticides sometimes used in road ROW can be lethal to wildlife by attracting deer, to road ROW you are increasing the risk of deer-car collisions Why do you not talk about these impacts?

Response: Mowing is considered a routine part of road maintenance and only roads closed to motorized travel are considered linear wildlife openings

Issue. 7-3 Road closures

Letter: 1605 Research has shown that a large percentage of roads that are normally closed to the public are not barricaded adequately, and are still used by hunters (including poachers) in vehicles

Letter: 1632 I propose a 25% reduction in current roads through closure and restoration

Letter: 1723 (FW-058) you must include SPB roads in your road system if they have been entered more than once over the 10 yr plan period

Response: Comment noted

Letter: 1605 All roads used for logging should be closed upon completion of the cut The EA does not document the need for permanent roads throughout the forest

Response: With State, County, and FS routes, a transportation system is in place that meets access needs into most areas of the Forest This system will, however, require some reconstruction to meet expected use needs with the majority of the reconstruction involving minor work as defined in EIS Chapter III, Part II(a) utilizing existing routes The FS road system must meet not only the access needs for resource production, but must also provide access for a wide variety of other uses and needs including recreation, mineral exploration, special uses as well as taking into consideration the mobility needs of people with disabilities

Letter: 1409 people used to enjoy car camping on FS roads before the roads were closed I can see why it is a good idea to close these roads But if they are to be closed they should be closed all year round

Letter: 1645 Many roads on the Raven district are closed by locked gates the majority of the year I am told the rationale behind closing these roads is the protection of RCW and to prevent dumping My complaint is that during deer hunting season the locks are removed from these gates and these roads are opened up I do not understand why these roads must be closed the majority of the year but the moment it is time for hunting season they are opened up If the RCW need protection, do they not need protection year round? I definitely think the FS needs to rethink its road closure policy If a road is closed because it crosses a sensitive area or for any other reason it should remain closed Not be opened for a special occasion or special use unless this use is a permitted event

Letter: 1723 You need to develop and show a plan to close roads and minimize fragmentation You do not do this and do not adequately assess the environmental impacts of roads

Letter: 1734 existing forest roads should not be closed to the land owners If I were a hunter I could drive down any road in the forest and enjoy it during hunting season Since, I try not to visit our forest during hunting season, I'm penalized A reason given for the roads being open only during hunting season at a FS open meeting was "hunting fees contribute a lot of dollars to the forest" If it is dollars and cents, what about all the volunteer man-hours ($$) donated to the FS, and the tax dollars that make up the FS budget

Response: Site specific analysis allows the placement of restrictions on any travel route or area for all or part of any time period in response to a variety of management and resource needs and objectives Specific direction is contained in Forest-wide S&G With use restrictions and closures, the open road density can be effectively reduced to meet management and resource needs and objectives All restrictions are applied in accordance with 36 CFR 261

Issue: 7-3 Road closures

Letter: 1310 FS documents talk about obliterating roads Have you ever really obliterated a road other than a temporary timber sale road?

Response: Funds have been allocated and roads closed and revegetated in past years

Letter: 1723 MA-2-18 - roads are not linear wildlife openings
Letter: 1723 (MA-1-18) special use roads are not linear wildlife openings

Response: Roads may become linear wildlife openings depending on their management

Issue: 7-4 Roadside management

Issue: 7-5 Non-motorized trail access in the Forest

Letter: 1309 Alt 6 & 7 will require an increase in the construction of horse trails This work will require cultural resources surveys that follow the stipulations of the R8-PA, the MOU, and the Heritage Management Plan

Response Comment noted

Letter: 1723 (pg 36 DEIS) Why do you give Alt 4b so many more miles of mountain bike trails than other alternatives?

Response It is actually in 3 alternatives, 4,4A and 4B A range of mileages were to be considered The final could well have more or less

Letter: 1723 (pg 198, DEIS) where would mountain bike, horse, and all other trails be located? You need to show your approximate proposals so the public can see which areas will be impacted

Response: That will be site-specific planning and not necessarily located in the FP, other than by Forest

Issue: 7-5-1 Equestrian trails

Letter 610 request for trail designation on the Trinity District, D C N F , Alabama Creek Wildlife Management Area, Equestrian Trail, that has been on the ground and frequently used for the PAST 10 years!
Letter: 1433 *Equestrian trails should be no more than 40 miles Horses should be allowed only on trails designated for them*

Response: Comment noted

Issue: 7-5-1 Equestrian trails

Letter 315 Texas needs more horse trails I do oppose the grazing of horses in sensitive areas, however the small amount of traffic a few trail riders would produce would not cause any ill effects to 99 9% of our parks
Letter. 849 As a horse owner, I am finding it increasingly dangerous to ride along roadsides because of increasing traffic and thoughtless people We need more quiet trails in the NFs
Letter: 1409 The Sam Houston Equestrian Society needs trails for their use and they have shown they will maintain them

Response: There is presently 52 miles of designated horse trails on the Davy Crockett NF The draft FP is proposing approximately 142 miles, which would be added to the Angelina and Sam Houston NFs

Letter: 315 I am offended that bikers and hikers are allowed to patronize our parks while the very animals (horses) who built this great state are banned

Response Horses are obviously prohibited from developed family campgrounds because of the conflict of uses and the safety of other users There is a horse camp on the Piney Creek Horse Trail on the Davy Crockett NF

Letter: 1236 Equestrian trails - the FS preferred alt. has 142 miles of these trails in the forest . these contribute to forest loss and fragment the forests even more

Response: No trees are cut in the location and designation of horse trails

Letter: 1466 Any alternative that adds equestrian trails to the system would be acceptable to us The quality of these trails would be our main concern We would expect to ride safely, without fear of being shot or run off the trail Trail heads with adequate trailer parking would also be necessary
Letter: 1599 The need to locate and construct parking areas (and future campground) accessible to horse trailers is essential to the growth of this rapidly increasing recreation (equestrian trails)

Response Trail head areas would be a necessary part of any proposed equestrain trail system Hopefully, primitive type camping facilities will be able to be constructed on each Forest trail system

Letter: 1164 Please stop the hunting and shooting in the grassland areas where we have equestrian trails

Response S&Gs to control indescriminate shooting are identified

Issue: 7-5-2 Hiking trails

Letter. 132 Keep horses off the Lone Star trail
Letter: 538 Please consider restructing hiking trails to pedestrian use only Have you ever followed -on foot- a group of horseback riders on the trail? I have- with my 5 children and a basset hound It is NOT a pleasant experience
Letter: 858 Control burns are needed to maintain the LSHT,
Letter: 1723 (FW-144) I want the Lone Star Hiking and other trails separated from ORV trails to ensure that no use conflicts occur
Letter: 1723 (FW-135) I am opposed to not requiring every hiking trail [to] have a 300 ft buffer (150 on each trail side) I want this required

Response: Comment noted

Issue: 7-5-2 Hiking trails

Letter: 144 Many sections of our trail have been devasted by logging. Several have been severely impacted by ORV use on trails. Most of the beautiful hardwoods have been removed, leaving nothing but pine tree plantations.

Response: In the management of the RCW, an endangered species, most of the hardwoods in designated areas have been removed as well as the pines thinned In some areas, SPB infestations have killed all the pine trees, leaving an area of apparent devastation, with heavy growth of briars and other shrubs

Letter: 1723 The Lone Star Hiking Trail and all other existing hiking trails must remain a hiking trail only

Response: There are no plans to the contrary.

Letter: *1605 Clearcutting across hiking trails should be eliminated*

Response: The final plan provides for a trail corridor up to 150' on both sides of the trail The trail corridor will generally be managed for retention or partial retention of tall forest cover Prescribed burning will be applied in selected areas and not in others. This will vary according to T&E species management, necessary on and along the trails Trail maintenance and marking will continue as it has in the past.

Issue: 7-5-3 Multi-use trails

Letter: 1409 I am happy to hear these two groups (ORV's and equestrian) are sharing trails with no problems

Response. Comment noted

Letter: 1310 The idea of mixed use trails for horses and ORV's seems like a recipe for disaster to me! Will the FS (the taxpayer) be liable for resulting injuries?

Response: Actually, it seems to be working quiet well Both groups have expressed approval and are working well together

Letter: 1723 even with a designated trail ORV use is prone to conflict For instance ORV trails cross the Lone Star Hiking Trail in several spots and the noise and other problems are not mitigatable The trails need to be separated

Response: Separation of trail users, hikers and others, is a definite consideration in all trail planning Since the Lone Star Hiking Trail (LSHT) is 127 miles long and traverses the entire Sam Houston NF, it is almost impossible to have any other kind of trail system without crossing the LSHT

Issue: 7-6 Trail maintenance

Letter: 1310 Recommendation Stream segments may be cleared of obstructing logs and limbs to the minimum level necessary to allow canoe passage where such stream *segments have been designated as canoe trails*

Letter 1409 trails needed to be maintained at a desirable level to serve their purpose New construction needs to be carefully considered

Letter: 1409 More time and money needs to be put into improvement and upkeep of present trails The LSHT to be a trail that the general public can use needs to be kept marked with aluminum markers, it needs to be brushed several times a year to keep it 4-6 ft wide Stream crossings and erosion needs to be addressed and kept up to date This would be simple bridges, bridges made out of native wood, or moving the trail a few feet

Issue: 7-6 Trail maintenance

Letter: 1409 We would like to be able to maintain all of the trail using our own experience and good judgement and not be bound by rules made by the public who never do trail maintenance or are never seen on the trail

Letter: 1605 Stream segments may be cleared of obstructing logs and limbs to the minimum level necessary to allow canoe passage where such stream segments have been designated as canoe trails

Letter: 1605 Recommend Normal trail maintenance, including clipping, brushing, and removal of fallen trees will be permitted

Letter: 1605 Recommend Trails may be cleared of obstructing logs and limbs to allow safe passage Dead trees may only be removed when there is a clear danger to hikers

Response: Comment noted

Letter: 1409 It would be ideal if one person from the FS only job would be recreation They could over-see the development and maintenance of all trails I am in favor of doing what is best for the LSHT to be a nice place for the general public to enjoy hiking and backpack in the forest

Response: The FS certainly agrees, however, with budget cut backs and cuts in the number of employees, such a person seems less likely to happen

Letter: 1453 I urge stabilization of existing trails, no construction of additional trails

Response: Stabilization of existing trails is needed and is planned Additional trails are needed for different trail users

Letter: 1723 FW-141 - allows too much soil erosion with at least 10 inches of erosion and 50 feet of this This is too much erosion to allow and the standard should be brought down to 6 inches period

Response: The IDT is not aware of any documented research to support this

Letter 1802 FW-139 Please change to "Reconstruct or install appropriate devices on all trail sections to minimize erosion " Drainage dips are superior to waterbars, and in fact, waterbars are now considered antiquated Trail construction and maintenance methods are constantly improving, and the Plan should accommodate this

Response Much depends on the slopes, both down & out from the trail Also, soils is an important factor Waterbars are probably more successful in East Texas to control water run off

Issue: 7-7 Trail Closures

Issue. 7-8 Trailside management

Letter. 858 I feel the active trail networks should remain under the present full management process (with a minimum of special regulations) Control burns should continue across trail paths and streams, select-cutting for timber sales and trail clearing should remain as presently done, but abandon the corridor idea for trails and streams

Letter: 1723 (pg 46, LRMP) trails do need protective corridors to mitigate the damage that timber cutting does to trail use

Issue: 7-8 Trailside management

Response: Comment noted

Letter: 1605 Recommend Trails should have a 300 foot protected corridor No logging or burning should be allowed in these zones Salvage and thinning should not be allowed in protected corridors The only cutting that should be allowed within 150 feet of a trail is if a tree clearly threatens the safety of trail users

Letter: 1605 Recommend Paint marking trail zones on the side of trees away from the trail No trees within zone will be painted, no ribbons or tape except for research purposes and must be removed when research is finished

Response: Recommendation noted

Letter: 22 One problem we have everywhere is no parking Ten to 15 trailers are hard to park An over night area would be nice too It would be easy to add a horse camping area to the Double Lake area Not in the park proper, but off the road to the park The same could be added to the Stubblefield Lake park

Response: Horses are obviously prohibited from developed family campgrounds because of the conflict of uses and the safety of other users There is a horse camp on the Piney Creek Horse Trail on the Davy Crockett NF

Letter. 277 protective corridors around trails should be a priority The recommended policy of rerouting trails depending on logging priorities is not acceptable

Letter: 293 Please establish a permanent buffer zone of 150' on each side of the trails through East Texas NFs

Letter: 356 Trails that we've grown to enjoy are obliterated within days and the dead limbs and twigs make it unsafe for man or beast until they rot away in five years

Letter: 368 I want trails to be better protected

Letter: 388 Trails which make our public forested land most attractive to an urban population are INADEQUATELY protected and conserved

Letter 848 We believe there is particular urgency in controlling cutting and burning within 150' of trails

Letter: 993 What I would like to see is a view along my Big Woods trail of trees. Fully four miles of the trail are through clearcut areas, termed plantations at this time

Letter 1058 I would hate to see any cutting along these beautiful trails

Letter: 1310 Trailside zones of adequate width and total protection from timber harvest, along with ample scenic and other special off-limits to logging, are the best, most effective and most cost-efficient way to provide vegetative and habitat diversity throughout the forest This can be done and still leave 60% of the forest open to commercial logging

Letter 1310 *There must be no vegetation manipulation within these trail corridors, except for normal trail maintenance and felling trees that present a clear* and present danger to hikers No prescribed burning No cutting of trees for wildlife enhancement or other such loopholes SPB control only be use of verbenone. Just let nature manage these corridors

Letter 1310 Trail corridors 1) provide better recreation experience because of the shady, more open understory Big old trees provide a enjoyed element , b) provide for greater vegetative diversity c) they will serve as travel routes for wildlife, connecting larger areas of old growth

Letter: 1310 All designated hiking trails and all designated equestrian trails and all designated ORV trails should be protected within a 300-foot wide corridor

Letter: 1313 At least 125 feet on each side of trails should be protected from logging and burning

Letter: 1393 I encourage a 300 foot wide corridor for hiking and equestrian trails instead of the more narrow corridors proposed by (alt 4B)

Letter. 1435 I have spent several hundred hours working on a hiking trail in the Sabine NF I become upset when I find that the trail has been cut over Clearcuts are horrible and inexcusable Even beetle cuts are a mess and are not needed across the trail We have seen the trail burned over and even bridges burned during prescribed burns Burns should not be allowed to go right up to the streamside I recommend a buffer zone of 150 ft on each side of the trail. This will reduce the eye sore caused by clear cuts

Letter. 1568 Urge the protection of an 800 ft wide corridor for hiking and equestrian trails

Issue 7-8 Trailside management

Letter: 1605 150' buffer (no-cut/no-burn) zones on either side of hiking trails (300' total) visual quality of the trails should be improved
Letter: 1605 What protection are specified in the USFS Trails Handbook/or in the Trails South Guide In the past you have clearcut right across trails In other areas you have re-routed trails to "get" timber
Letter: 1608 Provide a 150 foot corridor on each side of a hiking trail In this corridor there should be no prescribed burning, no SPB cuts and no relocating of the trail for logging purposes
Letter: 1631 Protected corridors should be established for trails
Letter: 1679 There should be a protected area for 150 ft on each side of all designated trails Trails of all types There should be no cutting or prescribed burning within these protected zones Trails should not be relocated, so that timber can be reached There should be limited maintenance on trails The trash should be picked up and the trail should be repaired where erosion or other damage has occurred
Letter: 1679 Don't let trails cross trails designated for different modes Trails should be created and designated for different modes of transportation Law enforcement should be increased to insure people use the appropriate mode for a trail
Letter: 1679 There should be no clearcutting across trails A protected zone should be set aside for 150 ft on each side of all trails
Letter: 1723 need to mark clearly a zone around all trails that is off limits to gun use
Letter: 1723 (pg 195, DEIS) trails uses, at present, are indeed subordinant to other activities. a 150 ft buffer zone on each side on the trail (300 ft total) must be erected
Letter: 1765 or burning shall not cross these (75 ft along both sides of all streams and trails) protected corridors
Letter: 1765 Logging must be limited , not crossing trail protected corridors
Letter: 1801 should give more protection for and trails There should also be protection of a three hundred foot wide corridor for hiking and equestrian trails As mandated by the NFMA, the plan must ensure their protection

Response: The final plan provides for a trail corridor up to 150' on both sides of the trail The trail corridor will generally be managed for retention or partial retention of tall forest cover Prescribed burning will be applied in selected areas and not in others This will vary according to T&E species management, necessary on and along the trails Trail maintenance and marking will continue as it has in the past

Letter: 1723 (pg 75, LRMP) define or explain what you mean when you mention the trail corridor and "Management within this zone should be to enhance or compliment the hiking experience " [refers to VQO matrix] the Forest Landscape Architect not "should", but "must" be involved in the EA process I want a mandatory, no touch, no cut, trail corridor except for routine trail maintenance activities as mentioned above and erosion control or moving a bridge in kind of activities

Response· Resource mgmt adjacent to the trail should be done for recreational emphasis, not timber or range or wildlife Thinning to encourage hardwoods & flowering vegetation might be one example A wildlife pond might be constructed closer to the trail to provide fishing & viewing, etc

Issue: 7-9 General

Letter· 1453 Flood control structures of any kind should be discouraged
Letter: 1605 ORVs crossing hiking trails should be eliminated
Letter: 1605 Too many roads make it difficult to control illegal activities
Letter· 1605 Trails should not be relocated without good reasons
Letter 1627 Alternative 2
Letter: 1723 (MA-9a-31) add "if ecosystems are protected and not overused" to the sentence

Response: Comment noted

Issue: 7-9 General

Letter: 1605 Recommend Bridges should not be built for ease of trail use, just to minimize erosion or other impacts from trail users

Response: Recommendation noted

Letter: 1723 (pg 193, DEIS) you mention user conflicts but you never talk about what you will do to reduce or eliminate them You need to separate hiking trails from ORV trails so they do not cross and potential conflict are eliminated I want a standard that sets FS policy to remove and prevent such trails from crossing In addition you have an Executive Order that requires you to prevent such conflicts for ORV use to be acceptable

Response. Separation of trail users, hikers and others, is a definite consideration in all trail planning Since the Lone Star Hiking Trail (LSHT) is 127 miles long and traverses the entire Sam Houston NF, it is almost impossible to have any other kind of trail system without crossing the LSHT

Letter: 1631 Cutting across trails and relocating trails just to accommodate logging in public lands should not be permitted

Response: The final plan provides for a trail corridor up to 150' on both sides of the trail The trail corridor will generally be managed for retention or partial retention of tall forest cover Prescribed burning will be applied in selected areas and not in others This will vary according to T&E species management, necessary on and along the trails Trail maintenance and marking will continue as it has in the past

Letter 1679 The Draft FP would create too many new bridges Bridges help open up the forest for better access, increasing the threat of manmade fires and illegal activities like poaching, dumping, and growing illegal drugs Bridges affect streamside habitat, change water flows, and cause erosion and siltation Bridges should only be built to minimize the damage of a necessary road No bridges should be built in wilderness or scenic areas

Response· There will be no road bridges built in wilderness or scenic areas

Letter: 1723 (pg 235 DEIS) Forest Highway, with the definition that is given I am very concerned that this is a major federal action significantly affecting the quality of the human environment You will permanently turn these roads over to another jurisdiction so the environmental impacts need to be considered by you the FS of making such a decision

Response Definitions in the glossary were obtained from the source documents listed on page 224 of the DEIS This terminology was used by the IDT in preparing the revised plan and EIS

Letter· 1802 FS-142-148 Eliminate the reference to ORV use Retain language to apply to all trail users All users have the potential to damage resources, impact wildlife, and cause conflict These standards should apply equally, and not single out and discriminate against the OHV user

Response· This is true However, the ORV use probably has more potential to cause resource conflicts than any other trail user

Issue: 8 COMMUNITY STABILITY

Issue: 8-1 Local economy and jobs

Letter: 614 I would like to see more tourism in East Texas, particularly foreign tourism now that the dollar exchange rate relative to foreign currencies favor us

Letter: 1733 Economic and social impact Alt 4B will have a greater impact on the social and economic fiber of the East Texas Piney woods, i e declaring the Sam *Houston NF an URBAN FOREST will directly impact Montgomery, Walker and San Jacinto Counties*

Issue: 8-1 Local economy and jobs

Response: Comment noted

Letter: 572 We need to keep tourists coming to our state They bring money and jobs to the state

Response: The FS strives to maintain NFGT benefiting all mankind Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy

Letter: 1310 The DEIS calculates 1058 fewer jobs generated by alt 6 than alt 4B How was that calculation made? Would an independent private economist agree that 41 mmbf/year will produce 1058 permanent jobs?

Letter: 1679 What are the sources for figures on employment Where is the research and documentation to back up these employment numbers?

Response: Calculations were performed using a computer-based economic input-output model called IMPLAN Input-output analysis is a procedure for describing the interdependencies of production and consumption sections within the impact area Within IMPLAN, direct, indirect, induced, and total impacts are calculated For the DEIS, calendar year 1990 data was used Response coefficients for timber, recreation, wildlife expenditures, and county returns were multiplied by resource outputs by each alternative to arrive at the final calculations (ref App B, EIS)

Letter: 1310 the total number of jobs produced by the NF is next to insignificant in terms of the whole East Texas economy It is to be noted that even in Oregon, where the economy is much more dependent on timber, the predicted hard times and economic dislocation so loudly proclaimed to be inevitable after federal timber harvests were drastically reduced, never happened

Response: The EIS and Plan are not about jobs, but managing the land in an ecosystem manner

Letter 1613 Effect that ORV riders have on tourism revenue to the economy California has estimated the annual impact of ORV users in that state to be $3 billion per year In our locality, ORV riders buy their machines, parts, gear, oil and gasoline, and food and lodging during trips

Response: ORVer's do indeed contribute to the economic input of the surrounding areas However, the Plan has not attempted to break out independent analysis for ORVer's, hunters, anglers, hikers, campers, or other selected groups

Letter: 1629 Has anyone really considered the impact this (ORV restrictions) could have on the local businesses on Hwy 63? Many of these people's livelihood depend on catering to the needs of the lake recreation/ORV riders that visit the Boykin Springs riding area

Response: ORV restrictions on the southern portion of the Angelina NF should have a minimal impact, if any, as ORVer's will still have areas to use Other forest users and ORVer's will continue to travel on Highway 63

Letter. 1723 (pg 181 DEIS) you use outdated figures for how many Texans work in the wood-based industry

Response: New figures as of Feb 1995 show timber to be the second cash crop in Texas, behind only cotton In terms of all Texas agriculture commodities, it ranks fifth, following beef, cotton, poultry, and milk The forest industry employs 61,000 workers in Texas In East Texas, it is the topranked manufacturing employer ("Forests & The Texas Economy in the 1990's", TFS 1995)

Letter: 1723 (pg 186 DEIS) no counties that you mention are very dependent on NF funds for school and road budgets

Issue 8-1 Local economy and jobs

Response: Though no county is 100% dependent on the NFGT for school and road budgets, the 25% return to counties does aid counties and help offset those taxes lost due to the non-taxation of federal lands

Issue: 8-2 County revenues

Letter 1387 I personally feel that we should be increasing our sales and harvesting more timber in order to have a more reasonable payment to the county from the National Forest

Letter· 1632 The current 25% system prompts counties to push for increase in sales and related county receipts Sound resource management should not be based on the principle Counties may benefit from a set annual fee paid by the FS in lieu of taxes and instead of the current 25% I support such a change as better for all parties involved

Letter: 1636 I have a keen interest in how much money San Jacinto gets from NFGT However, it is my opinion that NFGT has no obligation to mismanage the NF in order to achieve any set amount

Response: In 1994, San Jacinto County received $287,963 from the 25% payment to counties Timber is not harvested to produce revenue as 25% payment to counties Timber is harvested for improving wildlife areas, performing stand improvement, preventing or controlling insect infestations and other *reasons Revenue is a by-product of this work and the 25% funds are also then a derivative and not the purpose of timber sales*

Letter: 1510 The DEIS alt 4 will cost much with little pay back With the incoming conservative congress, economic returns will be VERY IMPORTANT, and economic considerations should be taken SERIOUSLY Paybacks to the local governments must be considered Recreation is a very poor way of generating dollars from federal lands Unless proper reimbursement can be given to the local governments for the loss of tax base, a significant portion of the National Forest should be privatized

Response: Economic considerations are but one of the issues facing land management planning A 1991 study (Hickman and Crawther) of 1987 found nine of the 12 counties received more from the 25% returns to counties than if the land had been taxed at the average current-use value In many cases, twice as much revenue went to the counties from *FS* managed land as compared to current private use valuation

Letter: 1618 Schools and counties will suffer less under plan #2

Response: Under any alternative, schools and counties should not suffer Payments to counties are a byproduct of revenue, which comes from recreation, timber, and mineral programs

Letter: 1622 On the issue of local communities such as school systems, etc receiving a percentage of money from USFS timber sales I recommend through the political process, a change that would provide fixed annual payments where the dollar amount is based on taxable value of the land and/or the land derived commodities Such a payment method would eliminate annual variations in monies received which is often due to unpredictable factors such as changes in political climate, market values, or natural phenomena typically beyond practical control

Letter: 1680 local forest communities benefit in the long run from sustainable yield forest management, which also allows for a robust recreation sector of commerce I support proposal to Congress which would base FS payments to counties and schools on acreage, not on income, as done by the National Park Service

Letter: 1767 If our forest lands in San Jacinto County needs to be RCW habitat some method of payment other than timber sales must be used in computing payments to the county

Response: Comment noted, though this is really a congressional-interest item

Letter: 1670 Payments to counties should be based on National Forest acreage in the county (adjusted for inflation) The county could budget on a definite amount

Issue: 8-2 County revenues

Response:

Payments to counties are based on the revenue from each Forest Revenue payments to each county are based on the percent of the Forest occupying a specific county land Any other means needs congressional action

Letter: 1435 payments to counties on a per acre basis from NF land is higher than the current per acre use tax paid by private timberland owners This would be brought more into line by reducing ASQ In fact, the payments going to schools is insignificant (less than 1%) for all but four counties and even there it is only about 4% I will speculate that in the counties that receive the most money from timber sale need the least amount of road building, especially since the FS is building more roads there

Response: According to a review of 1987 (Hickman and Crowther, 1991), 25% payment to counties were higher in 9 east Texas counties than the average current-use value tax In three counties, the average current-use value tax was higher Remember, county roads are constructed for a variety of reasons, such as meeting the needs of local residents, school bus transportation, and timber management

Letter: 1767 Alt 4 would increase the acres to Alt 4B would affectively take San Jacinto County out of timber production in the US Forest Land causing financial hardship throughout the County . about 15% of San Jacinto County are USFS lands Taking any more land than is absoolutely necessary out of timber production will work a hardship on San Jacinto County We are a rural county with no industry and depend on timber sales in the county to both create jobs and for payments to the county

Response: Keep in mind, land isn't designated to be put into "timber production " Timber production is a byproduct of land management As evidenced by a review of the 25% payment to counties during the past 25 years, San Jacinto County's payment has fluctuated greatly and no assurances can be given as to meeting precise figures in future years. However, as Houston continues to expand and the Sam Houston NF is viewed as the Houston community outdoor recreational area, then tax dollars will be increased through visitor outings and use of San Jacinto County stores and other facilities

Issue: 8-3 General

Letter: 1409 No plan should affect the local economy Timber sales should be cut gradually and the difference picked up by recreation or other areas Less grazing is a step in the right direction The SHNF does not seem the right place for grazing
Letter: 1723 (pg 5 plan) do not forget that the NFs are also surrounded by small subdivisions not just small landowners

Response: Comment noted

Letter: 1310 Recommendation· Periodic clean-ups will be organized to remove trash from streams and streamside areas
Letter 1605 Recommendation Periodic clean-ups will be organized to remove trash from streams and streamside areas

Response: Recommendation noted

Letter: 1310 The FS needs to help make local residents aware of the many benefits provided by the NF besides timber NF serve as vast recreation parks , and NF contribute indirectly to the tax base because lands abutting or close to the NF command much higher sales prices and therefore produce more ad valorem taxes, c) NF provide copious supplies of clean water, both surface water and ground water .

Response: We agree' We need to tell our story better, but in the long run, the success of our work is being good neighbors and good stewards of our earthly ecosystem

Issue: 8-3 General

Letter: 1409 I am delighted that additional money will go for proposed recreation programs Attractive 4B is kindest to the local economy

Response: Recreation is important and we view recreation as an important tool in letting people experience their NFGT in Texas

Letter: 1627 Economically deficient forested communities in East Texas will benefit from alternative 2 while other resource amenities are maintained Grazing should be permitted but not emphasized

Response: Presently, we permit grazing, but do not emphasize it

Letter: 1670 stop this ecosystem propaganda and tell what you are really doing - you have been ordered to make money and "support the local economy" by selling timber, minerals, etc off public lands and that is what you are going to do

Response: No such orders to "make money" have been passed down Yes, we do return dollars to the local community based on timber and mineral sales, but this happens as a result of good ecosystem management

Letter: 1679 The draft FP is not based on good economic management It encourages the sale of timber regardless of market conditions This is very hard on county governments and school boards that depend on turnback dollars in lieu of taxes They are unable to budget for the future and suffer when timber is dumped on the market at very low prices Payments to county governments and school boards should be based on land taken out of the tax base as is done for National Parks

Response: You make some valid points, but remember, timber is sold only when a decision has been made to remove timber for the benefit of the ecosystem In changing the tax situation, this is an item Congress would have to legislate

Letter: 1723 Define "economically sound" Why are you not saying that grazing will be ecologically sound? This is a National Grassland and it should be delivering the ecosystems that cannot be delivered or are rarely delivered on private lands Therefore a restored tall grass prairie with little grazing or grazing with moving bison herds makes the most ecological sense

Response: Economically sound means the benefits are at least equal to or greater than the costs Grazing, when it meets the applicable guidelines, is indeed ecologically sound and beneficial to portions of the grassland

Letter: 1723 (pg 27 Summary) how can grazing be suitable for 600,000 acres of NF when you say that it should not be in various areas like scenic areas, streamside zones, etc and when you say that you want to deemphasize grazing?

Response: While grazing is being de-emphasized, please keep in mind grazing helps vegetation and rejuvenates dormant species

Letter: 1723 (pg 245 DEIS) I do not see where the maximum of net public benefits absolutely adheres to multiple management The net maximum benefits may not be the best way to meet the needs of the American people

Response: Net maximum benefits are but one measurement in meeting the needs of the American people It is not the goal, but a tool to determine some of the benefits the public realizes The goal of a healthy ecosystem remains!

Letter: 1808 Issue 8 Community Stability, p 48 This section make the statement that "Grazing receipts from permittees on the Caddo and LBJ National Grasslands is [are] greatest in Alts 1, 2, and 3 and lower in Alts 4 through 7, however, this difference is minimal and may be offset by the increase in recreational opportunities in Alts 4 through 7 " However, on P 36 under the Community Stability section, it states that "Grazing remains consistent to current levels on the Grasslands " Developed recreational facilities, shooting ranges, and special interest areas should decrease available grazing acreage

Issue: 8-3 General

Response: Keep in mind, grazing is deemphasized in most forest alternatives However, on the Grasslands, grazing (along with range management), is a key component of maintaining a healthy ecosystem Land allotments with a recreation emphasis would not always prohibit grazing, but could reduce use in terms of intensity and seasonal use Other areas would, as you suggest, decrease grazing Obviously, we don't wish any livestock to call the shooting range "home" Grazing will also have to be seasonally adjusted to allow for sensitive plant populations to develop

Issue 9 WILDLIFE AND FISHERIES

Issue: 9-1 *Extirpated or introduced species*

Letter: 1636 I appreciate the cooperation with Texas Parks & Wildlife on projects such as reintroduction of wild turkey, etc

Response: Comment noted

Letter: 1258 I would like to recommend that the Angelina NF (all NFs in Texas) be managed as habitat for the Louisiana Black Bear

Response: Recommendation noted

Letter: 1671 clarification should be provided regarding "desirable exotic species " , feral hogs should not be considered desirable The animals are not part of the original ecosytem and are damaging the forest and grasslands The Plan or EIS should discuss all the reasons why hogs are or can be a problem and support population control A statement should include the idea that the immigration of neighboring hogs will continue to be problematic without the understanding and help of adjacent landowners and managers The TPWD has the opportunity to be a helpful influence in this matter Problems with hogs include destruction of LL seedlings and other regenerating forest plants, damage to endangered species in bogs, competition with other wildlife for mast, possible problems with the reproductive success of ground nesting birds, possible disease vectors, damage to wildlife plantings, and damage to ground dwelling vertebrates such as salamanders or toads (some are rare or endangered

Response: Agree - See new section under Wildlife in EIS

Letter 1671 The Plan states that grazing of livestock will be prohibited in Candidate Scenic Recreation River Corridors, in Special Riparian and Wildlife areas, and in Scenic areas RNAs permit grazing of livestock only as part of scientific investigations Grazing of livestock will be discouraged in wilderness areas Are hogs classified as livestock? They are of domestic sources, they graze, and they root Rooting is often more damaging that grazing Since they may be defined as grazing livestock, how are they to be kept out of the restricted areas? They are presently in these areas, or soon will be if their expansion continues

Response: We are working with the State to solve this program We do not yet have an answer

Letter: 1679 The Draft FP needs to define desirable native species and assess the need for non native species If non native species are introduced, there should be a plan to convert to native species with minimum impact on the forest There should be clear old growth allocations, not just in bottomlands or RCW habitat Riparian zones should be defined by observation There should be no felling for fish habitat The percent of margins to surface and emergent/ submergent should be natural for each site, not based on an arbitrary formula Defining specific areas as habitat for a specific species creates unnatural boundaries It limits natural expansion and migration and increases probability of catastrophe

Issue: 9-1 Extirpated or introduced species

Response: We hope this move toward ecosystem management will help solve the problems you speak of

Letter: 1171 Angelina, Sam Houston and Big Thicket woodlands should be accessible by foot, bike or horseback only, not motorized vehicles which disturb the natural beauty I am personally opposed to our parklands being used by bikers and three-wheelers

Response: Motorized vehicles have a recreational right to pursue their enjoyment of the forests as long as they, like all trail users, do not harm the ecosystem Keep in mind, for many disabled Americans, motorized vehicles are the only way for them to enjoy the beauty of the forests

Issue: 9-2 Fish and aquatic resource management

Letter: 1605 No new lakes or ponds are needed
Letter: 1723 (MA-5-44) limits to motors must, not may, be applied
Letter: 1723 (MA-9a-01) remove "to the extent practical" There should be zero emphasis on nonnative fish except to get rid of them

Response: Comment noted

Letter: 1453 Introduction of exotic fishery, even to the extent of cold water stocking in controlled ponds, may have poorly understood impacts on the native fishery which the Plan seeks to emphasize With the flat terrain and extreme flood events seen in East Texas, there is always a chance that these exotics can escape from lakes and ponds, particularly from mainstem reservoirs I was disappointed to see no specific plans for restoring endangered fish such as the Paddlefish

Response: Agreed, trout stocking has been curtailed on the NFGT We are actively participating in the paddlefish recovery program with the TPWD and have secured two "Bring Back the Natives" grants to restock paddlefish on the Davy Crockett NF No, the Plan does not specifically address paddlefish restoration, but it is listed under the precepts of sensitive species and MA-4-03 specifies fish stocking only to restore native populations

Letter: 1605 Maintain an appropriate natural percentage of the shoreline in emergent aquatic vegetation for bank protection and for fish and waterfowl habitat

Response: Agreed, emergent vegetative species were for the purpose of preserving "natural percentage" from herbicide elimination and "gravel pit" pond construction with steep grades

Letter: 1671 The Dept encourages wetland creation or enhancement projects rather that developing small ponds than are not maintained and have little wildlife value The validity of constucting one pond per management unit is neither conducive to ecosystem management or to enhancing wetland values Constructing ponds scattered throughout compartments without an integrated plan for identifying existing wetlands and determining creation, enhancement or restoration opportunities is a costly and unnecessary practice While water is seldom, , a limiting factor to native wildlife species in east Texas, loss of functioning wetlands with high value has been significant and considerations for this problem should be a part of the overall land management plan

Response: Agreed, have edited as such

Letter· 1723 FW-014 & 015 - you ignore protecting and restoring streams You spend all your time on lakes and ponds and virtually nothing on the streams I object to this lack of balance

Response. The IDT does not understand the rationale for this statement

Issue: 9-2 Fish and aquatic resource management

Letter: 1605 MA-5-12/13 - Maintenance of particular percentages of lake margins/surface areas in emergent/submergent vegetation should be consistent with normal values for each body of water, not with arbitrary values of 30% (margins) or 10-50% (surface area) designed to support game species

Letter: 1605 MA-5-11 - Felling of dead, dying or crowded trees for fish structures should be prohibited, as this adversely affects the waterside ecosystem sufficient natural felling will occur to support natural fish populations Artificial felling of trees to create artificially large populations of game fish is likely to disturb natural balances

Response: Mgmt of vegetation in MA-5 is directed for man-made reservoirs, lakes, & ponds These artificial structures provide various values & mgmt will ensure continued viability of these desired values

Letter: 1723 MA-5-5 - define what "viable native fish populations can be maintained" means How will you determine this?

Response: Stocking of any fish species must be determined through site-specific analysis to have no detrimental effect on PETS or other sensitive species

Letter: 1808 Game Species, Affected Environment-Forests and Grasslands, p 92 The importance of increasing the flow of water to the fisheries resource needs to be explained, as well as including information of seasonal flow regimes and how they will be impacted by the proposed alternatives

Response: Maintaining water flow for stream related communities is obvious The effects of the various alts affect flow rates, but not significantly, the major effect is siltation, which is clearly defined in the FEIS

Issue: 9-3 Threatened, endangered, rare or sensitive species (PETS) EXCLUDING RED-COCKADED WOODPECKERS

Letter: 1385 Recovery planning should be limited to the RCW Red wolf and black bear should be reintroduced Other declining species must not be ignored

Letter: 1636 Without knowledge of how increased 4B acreage for RCW will impact these, then it does not seem wise to create new problems while solving old ones

Letter: 1680 Public surveys consistently show that most Americans don't think we have gone far enough to protect endangered species

Letter: 1723 (pg 81 DEIS) research by the FS has shown that Canebrake Rattlesnakes do not simply use bottom areas A lot of their time during the mating and warmer seasons are spent in uplands. So this plan will not necessarily have the impacts that you say

Letter: 1723 research at the SFA Experiment Forest on Canebrake Rattlesnakes suggests that areas fragmented by roads cause decline in snakes because they are often the victim of road kills

Letter: 1808 we are concerned that implementation of this strategy (i e available time of the District biologists) may replace management of Federally-listed species and other ongoing research projects in these NFs

Response· Comment noted

Letter: 1723 (pg 82 DEIS) you need to show what your plan is for reintroduction of both the Louisana Black Bear and Red Wolf are for the Texas NF's

Response We support the recovery plans for those species but as yet do not have an assigned role in their recovery

Letter: 1808 To date, the NF in Texas lack information regarding the location, status, and habitat requirments of several Federally-listed species Fragmentation of forest stands from high commodity production is more likely to negatively impact the RCW, other Federally-listed species, and the integrity of forest ecosystems than the projected amount of forest loss (although total forest loss of plant communities has not been determined)

Response: The high production alt was not chosen

Issue: 9-3 Threatened, endangered, rare or sensitive species (PETS) EXCLUDING RED-COCKADED WOODPECKERS

Letter: 1605 Prior to any activity which will involve the destruction of habitat, a thorough site-inspection should be made for any species which are identified as Federally endangered or threatened and which have a probability of occurrence of W1, W2, or W3

Response We do this as part of our BE process on every project.

Letter: 1605 The USFS must justify, in any decision to use methods which produce large areas of early successional forest, the acceptability of this negative impact to neo-tropicals, particularly in relation to the NFMA's direction to manage for biodiversity

Response: Changes in the age class distribution are considered in every project and BE

Letter: 1679 The Draft FP does not include the surveys required by NFMA, specifically surveys for endangered or threatened species and cultural resources

Response: The EIS and site specific EA and BE's meet NFMA requirements

Letter: 1723 *(pg 89 DEIS). you mention nothing about protection [of] state listed and Texas Organization for Endangered Species listed species I disagree that* Alt 4b is better for linking Alts. 6 & 7 6 & 7 provide for less disturbance and fragmentation of habitat and have large corridors and more OG How can 4b be better?

Response: See complete T&E list in plan appendix D

Letter: 1723 (pg 86 DEIS) impacts on PETS will not all be positive by the RCW DEIS This document ignored .the negative effects that have occurred and will occur in the future on the Slender Wakerobin .Nodding Nixie .. another sensitive plant species will not benefit from RCW management loblolly pine-hardwood ecosystem will suffer because you will cut down most of the hardwoods

Response: *How ecosystems are in balance all species associated with those systems will benefit Removal of most hardwoods is not the objective ecosystem* management is

Letter: 1723 (pg 84 DEIS) you need to discuss how you will protect and maintain and enhance habitat for the Big Ticket Emerald Dragonfly and American Burying Beetle and Hillard's Toothpick Grasshopper

Response: How ecosystems are in balance all species associated with those systems will benefit

Letter: 1723 FW-205 - the limitations are needed and not may be needed

Response: *This is a guide line that acknowledges professional judgement will often be necessary during project implementation*

Letter. 1808 Appendix D, Endangered, Threatened and Sensitive Species, p 1-6 This appendix contains some inaccurate information which should be corrected

Response. Improvements have been made in appendix D to reflect your concerns

Letter: 1679 Browse surveys were not conducted, and claimed benefits of early successional vegetation are not documented The age of hardwoods left is not stated It takes 30 years for hardwoods to reach mast production stage A sprout does not equal a 70 yr. old hardwood Hardwoods over 100 yrs old should be left to provide habitat The importance of hardwood mast production was not addressed

Response: Literature is replete with info that details the value of early successional habitat Detailed discussion of the value of various habitats & mast was described in the 1992 AMS. Analysis of the alts incorporated this info, especially as it relates to hardwood dependent species such as gray squirrels (see FEIS chapter III)

Issue: 9-4 Fragmentation

Letter: 886 There seem to be very few deer there (Sam Houston NF), actually less each year I never see any small mammals like possums and raccoons I do not think that the forest is varied enough to permit them to live

Letter: 1310 No more ponds or watering holes are needed.

Letter: 1605 No tree harvest or other vegetation management is allowed in this area except normal trail maintenance where authorized trails traverse SMZ's

Letter: 1605 For every mile of road built in unfragmented old growth, approximately 97 acres of forests are altered by the effects of the construction

Letter: 1627 Alternative 2

Letter: 1640 in alt 6 forest edge predators (raccons, possums, cowbirds) wouldn't have so many edges to inhabit like they would with large holes from use of methods in alt 4B This helps the wildlife that needs unfragmented forest

Letter: 1679 The Draft FP implements an untried management method without regard for the impacts on wildlife and bio-diversity Wildlife improvements should be restricted for PETS only Safety hazard reduction management should be limited to stands adjacent to public areas Guidelines for site specific activities, including impacts should be published The Draft FP does not leave dead trees for rebuilding the top soil and providing habitat

Letter: 1808 Proper range management with grazing as one of many management tools is important for the restoration of native grassland habitat beneficial to endemic and migratory wildlife species However, grazing in bottomland areas may degrade habitat essential for Federal trust species

Letter: 1808 Affected Environment and Environmental Consequences, p 52 It is stated, "The effects of alternatives are disclosed with the mitigating measures in place " In relation to fish and wildlife impacts, the first step in mitigation involves avoidance If impacts cannot be avoided, they should be minimized to the extent possible and unavoidable impacts should be mitigated to restore lost habitat values resulting from a project

Letter: 1808 The Physical Environment, Part II(b), Alternative 4(b), p 155 Due to RCW concerns, available oil and gas activities " will have fewer acres available for surface occupancy" These activies "could affect "RCW's during the nesting season and " may need to be relocated to SPB spots or storm damage areas to avoid damaging additional openings " In all cases, the method which causes the least amount of environmental impacts should be utilized Any action which may affect any Federally-listed threatened or endangered species should be avoided Otherwise, section 7 of the Endangered Species Act required formal consultation with the FWS

Response: Comment noted

Letter: 1310 Recommendation No tree harvest or other vegetation management is allowed in this area except normal trail maintenance where authorized trails traverse SMZ's

Response. Recommendation noted

Letter 1723 (MA-1-12) you have no road densities required to protect wildlife from fragmentation. You need them here

Response: Site specific analysis allows the placement of restrictions on any travel route or area for all or part of any time period in response to a variety of management and resource needs and objectives Specific direction is contained in Forest-wide S&G With use restrictions and closures, the open road density can be effectively reduced to meet management and resource needs and objectives All restrictions are applied in accordance with 36 CFR 261

Letter· 1472 Alt 4B will not provide for much early successional habitat which is critical for many of the neotropical migratory birds More should be done to address the habitat needs of such species

Response Early successional species are not the ones declining in numbers

Letter: 1808 Grassland Grazing and Range Management, p 68 This section states, "The Caddo and LBJ Grasslands have a mix of bottomland hardwoods (10 percent), prairie-savanna woodlands (25-35 percent) and prairie grasslands (50-60 percent) " According to these figures, the grasslands comprise approx 3,800 acres of bottomland hardwoods Livestock grazing has the potential to degrade wildlife habitat in bottomland hardwood areas through the removal of forbs, shrubs, and regeneration of hardwoods

Issue: 9-4 Fragmentation

Response: Cattle use is predominately on uplands, with little time in the hardwood bottoms No damage has been documented

Letter. 1808 *Many of the developed recreation sites are currently under utilized Additional developed areas would serve to decrease the habitat for some wildlife* species, in this regard, we recommend that funds be utilized to improve existing developed recreational areas instead of creating more

Response: *We are presently in the process of doing rehabilitation work on several areas* Costs of replacing old worn out facilities has gotten extremely costly and funding has been scarce

Letter: 1679 Even-age management creates early successional vegetation which is unsuitable for wildlife There is too much tannin to be eaten by most forms of wildlife, and the forest sites for range and nesting are reduced

Response: Wildlife benefits most from a mixture of age classes Any successful stages benefit many species

Letter: 1433 . the intention to retain 2 den trees per acre if available is a truly paltry provision for wildlife habitat Many more trees are needed

Response: The final revised plan retains snags & recognizable den trees for wildlife

Letter: 391 The negative effect of forest openings is compounded by the well documented fact that predators and cowbirds penetrate the surrounding forest in all *directions for hundreds of feet' Our Texas (& all of U S) birds are in trouble and further fragmentation of the national forests of our mature trees* must be stopped'

Letter: 1632 road density does not address adverse impacts to wildlife in terms of fragmentation Species such as the LA black bear and canebrake rattlesnake *are negatively impacted by the road densities described in the plan*

Letter: 1632 Efforts to quantify fragmentation must include horse, ORV and foot trails

Letter: 1723 (pg 163 & 170 DEIS) Alt 7, you say 7 wells will be drilled in the Coldspring/Coline/Mercy Oil Fields but you do not address how this additional fragmentation will interact with all past and present fragmentation Habitat fragmentation is a reality now, and not a possibility as stated on page 170

Letter: 1723 (pg 140 DEIS) you do not include any kind of estimate for the damage that this continuing fragmentation . will do to the forest and its residents Plus you say nothing about the road density issue and how much the oil and gas activities play a role in this phenomenon

Letter. 1723 all SPB and other temporary roads must be considered for fragmentation effects for the time it takes for them to have vegetation that is similar to the forest beside them you ignore this fragmentation and the effects this has on interior forest species

Response: The FEIS incorporates additional discussion on the fragmentation issue

Letter: 1723 cumulative impacts are also supposed to apply to all other activities in the NF which are near where these wells will be drilled or developed You ignore the total fragmentation potential and actual acreage that has occurred in the past, occurs now, and will occur in the future of both oil and gas drilling activities and all other activities that occur in the NF and grasslands (referring to minerals)

Response: *A complete discussion of acres of oil & gas production is found in chapter III of the FEIS*

Letter: 1723 fact that you have to add gravel and hard cement blocks seems to me to indicate that you are allowing riding in areas that are not suitable for such use The proposed so-called mitigation amounts to the same type of construction activity that has to be done to create a road Therefore the ORV trails will become more like roads and if this is so should be treated as such Their fragmentation of the forest and density should be looked at with as much review and analysis as regular roads

Response: The IDT agrees, site specific analysis will incorporate these concerns

Letter: 1723 MA-2-01 - 10-100 acres is too small an area to prevent fragmentation effects

Issue: 9-4 Fragmentation

Response: These sites refer to active & inactive RCW clusters, the HMA as a whole is restricted to the size & total area of openings that address the specific concerns for RCW

Issue: 9-5 General

Letter: 1723 (pg 95 DEIS) I disagree that Alt 4b has the best game habitat There are fewer old trees and the old trees that exist in this alt are not nearly as old as Alts 6 & 7. .. do not give credit to natural disturbances that will occur with the human generated ones via cutting in the forest
Letter. 1723 (MA-8c-141) there is no need for wildlife management in an area that is naturally evolving You can do wildlife management on the general forest
Letter. 1723 MA-4-118 - remove this one There is no need for such cavities in a riparian area since nature will provide these
Letter: 1723 MA-4-123 - I am totally against wildlife food plots in riparian areas This by the very definition means you will be cutting trees
Letter: 1723 MA-4-125 - I want no trees cut under the guise of helping endangered species
Letter: 1723 FW-013 - I am against the building of ponds
Letter. 1723 (plan pg 98) I am against any permanent food plots and ponds
Letter: 1723 FW-204 - you do not need wildlife ponds
Letter: 1723 (MA-9a-161) I am against any cutting for wildlife habitat improvement
Letter: 1723 I am against any wildlife improvement that calls for logging

Response: Comment noted

Letter: 1723 (pg 100 DEIS) Eastern Wild Turkey do not just benefit from RCW habitat but also benefit from bottomland habitat . Warren Starnes on 11-30-94 at the Trails Workshop said that turkey may be even more sensitive to ORV's and other noise disturbances than RCW But you do not discuss this and tell how your proposals will impact the turkey regarding disturbance

Response: Roads may be closed in turkey recreation areas until restoration is considered a success

Letter 1605 Wildlife habitat improvements in riparian zones should be restricted to improvements required for PETS only, and not provided for game or other non-PETS species Further, such improvements should be undertaken only if it is shown that they are essential to PETS viability and that the objective cannot be met by habitat improvements outside the SMZ, in the general forest.

Response: MA-4 has been revised to clarify state DFC & primary/secondary mgmt emphasis

Letter. 1723 MA-1-11 - you keep pushing more road and ORV trail use But you do nothing about limiting densities of such facilities so that wildlife is not disturbed on 11-30-94 Warren Starnes said that Eastern Wild Turkey may be even more sensitive to ORV use than RCW

Response: The emphasis is on managed Trail/Road development & use, not open, unrestricted use A new FWS was developed to guide mgmt of roads & road closures

Letter: 1723 (MA-2) Why are openings for selected wildlife species needed when there are plenty of natural openings like SPB and wind storms and other natural disturbance factors? What specific wildlife species will benefit and are they doing okay and do they really need additional other than natural openings?

Response: The NFGT is working closely with TPWD to provide appropriate openings for both game & non-game species

Issue: 10 RECREATION

Issue: 10-1 General Recreation

Letter: 1258 NFs of Texas should be administered to promote ecotourism.
Letter: 1258 New campgrounds need to be built and old ones improved and expanded Hiking trails must be developed and law enforcement maintained Facilities must be provided that will allow the average family to enter our forests and use them
Letter: 1281 The plan to restrict target shooting to designated units is a very good plan The Grasslands was too dangerous for horseback riders, campers, and hikers when there was shooting in open areas
Letter: 1409 There is an increase in demand for all types of recreation Hiking trails need to be maintained so they can be used by the general public Additional miles of horse and ORV trails are needed Mountain bike trails are needed if people are interested in maintaining them. Multi-use trails where this can be worked out as to maintenance Short nature trails and other short trails where they will be used
Letter: 1409 ... primitive sites for backpackers every ten miles. Primitive sites for car (truck) camping
Letter: 1679 The Draft FP does not address the impact of extensive even-age cutting on recreation
Letter: 1723 I do not enjoy stepping around cow manure .. (referring to grasslands).
Letter: 1723 (MA-9a-89) It is duplicative. [MA-9a-51] Remove it
Letter: 1723 (MA-9b-116) firearms must not be allowed
Letter: 1723 (MA-9b-35) I am against demand You need to fulfill need
Letter: 1723 (pg 15, Plan) how can hiking be both dispersed and developed recreation?
Letter: 1723 MA-8d-91, the ROS must be semi-primitive nonmotorized Who wants roads through a botanical area. People need to walk the area so they can see the vegetation
Letter: 1723 (MA-3-71) .I am quite against there being no areas that have no roads Solitude and quiet are also needed on the grasslands I want some areas besides Cross Timbers RNA for semi-primitive nonmotorized recreational opportunities
Letter: 1723 (MA-8b-81) I am for only semi-primitive and primitive activities in river corridors
Letter: 1723 (MA-8c-96) no discharge of firearms There also should be no bow and arrows, too
Letter: 1723 (MA-8c-91) only semi-primitive nonmotorized should be allowed.
Letter: 1772 I think you should be more concerned on how much damage camping is doing (than ATV's) Campers have no respect for the forest and do considerable damage with their campfires and garbage.

Response: Comment noted

Letter. 1805 I am interested in More time and better conditions for hiking and primitive camping esp less 1)human noise, 2) control of dumping and littering, 3) preservation of hiking only trails, 4)larger buffer of trees along the trails left in its natural state

Response: The final plan provides for a trail corridor up to 150' on both sides of the trail The trail corridor will generally be managed for retention or partial retention of tall forest cover Prescribed burning will be applied in selected areas and not in others. This will vary according to T&E species management, necessary on and along the trails Trail maintenance and marking will continue as it has in the past

Letter· 1262 Provide all visitors with the quality of outdoor experience that they seek such as conveniences, backcountry camping & solitude

Response: That is our intent in the FP

Letter: 1310 There are no opportunities for primitive recreation anywhere on the NFT, because of excessive roads Primitive recreation is defined . as usually 3 miles or more from roads The FS is not meeting its legal requirement to provide a full spectrum of opportunities within the ROS classifications

Issue: 10-1 General Recreation

Response: Wilderness areas provide a primitive experience

Letter: 1723 (pg 250-251, DEIS) the so called wilderness areas do not meet your criteria here [pg 204] for the definition of primitive and semi-primitive nonmotorized This means either one of two things Either these criteria are too strict and must be changed to reflect what primitive means for wilderness areas in TX or roads and other motorized uses must be obliterated in areas to produce acreage that conforms to your definitions

Response: Definition for physical setting of primitive is 3 or more miles from a road, which very small areas of the forest fit into this category Social setting of primitive is pretty well met by wilderness areas and management setting for wilderness is primitive

Letter: 1723 (pg 182, DEIS), there is a need for more use studies for recreation in the TX NFs the study done in Upland Island Wilderness that showed that hunting is the dominant use the study is seriously flawed since it was only done in hunting season and no other season was sampled for use the information is biased in favor of hunting instead of sampling equally and fairly for all potential outdoor uses

Response: Other information than hunting was gathered, it was decided that any other time of the year, use would be so low that the research center would not be able to sample enough people to get the type of information they were looking for

Letter: 1723 (pg 192, DEIS) certain uses have the RVDs provided Please provide these for hiking, backpacking, and other uses

Response: Hiking - 49,900 RVDs, Horseback - 30,800 RVDs, Motorcycle - 51,200 RVDs, Bicycle - 15,400 RVDs

Letter. 1723 (pg 204, DEIS) about the only primitive experience you can get is in the wilderness areas But many special mangement areas and streamside areas should also be primitive or some perhaps semi-primitive non-motorized

Response Most special MAs would be classified as SPNM Most areas on the NFGT are relatively close to or bordered by roads Even though they would be managed as primitive or SPNM, they might be influenced by the sounds and sights of traffic on the roads

Letter: 1807 Why should they (recreationists) have free use of the grasslands when most of the abuses are from them Why not require recreation permits?

Response The L&WCF prohibits us for charging a fee for dispersed use, unless some type of facility is constructed and used

Letter. 1723 (pg 174 DEIS) you do not give specific impacts on recreation for each alternative there is no cumulative environmental impacts

Response: It is important to understand that there are two levels of decision making in the FS The FP represents only the first level of decision making about the management of the NFGT Site-specific, project planning to implement the goals and objectives of the FP is the second level of decision making "Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions " (40 CFR 1508 7) Cumulative impacts are among the effects (40 CFR 1508 8) that must be included in considering the environmental consequences of actions (40CFR 1502 16) The "action" represented by a FP is the selection of a programmatic framework to guide future decision making on the forest, using FP management direction as a gateway to compliance with environmental laws at the project and activity level A FP is not an aggregation of 10 to 15 years of individual project decisions The EIS for a FP is, therefore, programmatic in nature Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources " In most cases, this commitment takes place at the specific project/activity decision point Therefore, the EIS for a FP commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the cumulative effects of individual projects/activities that have not yet been scheduled

Letter: 1723 MA-2-54 - define what "low level of change in natural conditions" is This is not a standard because it is not measureable

Letter. 1723 (FW-131, 132) define what "roaded natural and semi-primitive motorized recreation opportunities" are How does this relate to the definitions of these two terms in the DEIS?

Response. FS Recreation Planning handbook & manual provides for 5 levels of development ranging from primitive to highly developed

Issue: 10-1 General Recreation

Letter: 1723 (plan pg 113) - you want to emphasize motorized dispersed recreation even after you have shown that the grasslands are too small, are fragmented, have erosive soils, there are conflicts with other users and landowners and there are other resource problems Why do you allow such an incompatible use?

Response: This use will be/is on low level system roads There is no ORV use allowed

Letter: 1723 (MA-9b-61) what is the carrying capacity and the environmental impacts

Response: We don't understand this comment

Letter: 1723 several changes that need to be made the phrase "stately pine forests" is subjective and not factual you use the words "user demand" What is important is need What you never talk about here, and for any recreation use, is carrying capacity Demand should not drive this but environmental protection and carrying capacity should be the key elements in any review of whether additional recreational development is justified

Response: Carrying capacity can vary for a site depending upon how much &/or what kind of site mitigation or modification is done User demand is standard planning procedure to develop a relative level of planned development or management

Issue: 10-2 Management of Developed Recreation Sites

Letter: 1310 I am opposed to the development of Cagle Campground until and unless the population objectives for RCW on the whole TNF's is met
Letter: 1310 If there is indeed a need for more capacity and money is available, then I think that developing Scott's Ridge and Kelly Pond will be sufficient
Letter: 1605 Developed campgrounds should not be too close to hiking trails
Letter: 1605 Alt 4B proposes a number of new developed campgrounds, without citing specific evidence of need
Letter: 1605 A semi-primitive site should not be upgraded to a fully developed site simply based on supposed demand
Letter: 1605 Camp sites at some campgrounds would benefit from greater spacing between individual camp sites and more vegetation left to provide privacy and noise abatement
Letter: 1679 *Campgrounds should not be too close to trails Campgrounds should not be too crowded and the campsites should not be too close together.* More law enforcement is needed to insure that users do not abuse the campgrounds Even though erosion and waste problems in existing campgrounds have not been resolved, the DFP would create new campgrounds
Letter: 1723 (MA-9a-115) I do not want to maximize the number of visitors

Response: Comment noted

Letter: 1609 The national forest in Texas should be managed for people to enjoy If campgrounds were built and adequate facilities provided, East Texas would benefit from an increase in tourism

Response: The FS strives to maintain NFGT benefiting all mankind Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy

Letter 993 Selective cutting should avoid recreational areas

Response: Mature trees are always available, selective cutting is the best way to achieve this

Issue 10-2 Management of Developed Recreation Sites

Letter. 1310 The DEIS offers no usage data on current campgrounds to justify building new ones What is the average year-round occupancy rate at each of the current 21 developed sites?

Response: Acres on the Sam Houston NF are very heavily used, but there are no acres on Lake Conroe Developed recreation sites on Lake Conroe would also receive heavy use This proposal is a carry over of the 1987 FLRMP, which also proposed development

Letter: 1310 I am strongly opposed to developing a campground anywhere near Tarkington Bayou, since that area is one of the few places where hikers can enjoy some semblance of solitude and quiet such opportunities are rare and it is outrageous to destroy what few such opportunities as still exist

Letter: 1605 Tarkington Bayou Campground should not be developed, as this would negatively impact a beautiful area

Letter: 1723 (pg 133, DEIS) I do not want any developed campground at Tarkington Bayou I want the Tarkington Bayou area not developed and set aside to provide and enhance opportunities for semi-primitive and primitive outdoor experiences

Response: This was a proposal by the Sierra Club in the 1987 FLRMP and was carried over into this plan The proposal now, as it was then, is to develop a primitive camp in the area

Letter: 1432 I am very disturbed with National Forest's policy regarding the maintenance of the Harvey Creek park on Lake Sam Rayburn You have allowed what was once a beautiful park [to] deteriorate terribly Now I understand you no longer will maintain the boat ramp This is depriving the public access to a beautiful recreational facility

Response Shoreline erosion on Sam Rayburn Reservoir has been a force that we have not been able to stop, primarily because of the cost of trying to do so Even then, the Corps of Engineers convinced us that any shoreline erosion control work we did probably wouldn't work, unless spending millions, which would have to be appropriated by Congress

Letter 1605 The EIS repeatedly mentions serious shoreline erosion and soil compaction at Caney Creek, Harvey Creek, and Sandy Creek on the Sam Rayburn Reservoir, and serious solid and human waste problems on the Lake Conroe and Sam Rayburn shorelines These problems are not addressed in Standards & Guidelines and yet new sites are planned

Response· S&G for MAs do address problems with developed recreation areas, S&G for lake side and streams

Letter. 1605 Cagle Campground should not be developed because of the presence of a RCW colony The Sierra Club will oppose development of Cagle Campground until the FS can bring RCW population in the NFT up to the population goals of the Draft Plan Once this goal is attained, the Club would support this campground

Response: The campground construction was initiated in 1978 Because of the work that was completed there with the construction of loop roads and spurs, the RCW moved into the area The USFWS has been fully involved in the activity and construction of this area The area is under construction based on the 1987 FLRMP and input from the USFWS and the State of Texas

Letter: 1605 With a backlog of $16 million in needed repairs to existing facilities , it is inappropriated to consider developing new areas

Response First priority is to rehabilitate selected campgrounds, 2nd is to evaluate closure of some for varied reasons, and 3rd is to build new in areas of high demand, such as on the Sam Houston NF, close to the Houston area

Letter· 1670 Do more to maintain facilities at campgrounds Restrooms are non-existent at some. At Boykins Springs, they were in horrible condition this past summer You certainly do no(t) encourage visitation this way

Response· We are presently in the process of doing rehabilitation work on several areas Costs of replacing old worn out facilities has gotten extremely costly and funding has been scarce

Issue: 10-2 Management of Developed Recreation Sites

Letter: 1388 You will have to make it possible for tourists to come and enjoy East Texas There will have to be campgrounds and other necessary amenities provided

Letter: 1607 I think East Texas would benefit greatly if these national forests were set up with more campgrounds and other outdoor sport facilities It would create more tourism in East Texas and therefore benefit our economy

Response: The private sector has facilities available and as demand increases, availibility of facilities will become available in the private sector

Issue: 10-3 Dispersed Recreation Management

Letter: 22 Being a family group restrooms and showers would really be nice

Response: Comment noted

Letter. 1723 (pg 133, DEIS) the FS does not deal with what it will do about the solid waste and human waste problems on the shores of Lakes Conroe and Sam Rayburn

Response: That's true We have identified the problem, more monitoring and evaluation of the problem is needed in order to formulate possible solutions

Letter. 1632 Further allowances must be made for monitoring budgets and manpower to help minimize concentrated dispersed recreation Below are a few areas on the Angelina in need of some type of corrective action (see letter 1632)

Response: The IDT agrees However, funding has been quiet limited in this area

Letter: 1723 MA-4-103 - remove this one There is no where appropriate because concentrated recreational use and bottomland are not compatible

Response: That's kind of what that standard says However, there are circumstances when concentrated use desired & facilities are developed for that use

Letter: 1723 (FW-138) no trace camping must be required and not simply encouraged

Response: To require, means to enforce To enforce would mean regs & manpower to enforce far beyond our means & intentions Education is the best remedy

Issue: 10-4 Hunting

Letter: 55 No hunting should be permitted in our NFs
Letter: 125 Have "Safe Zones" during hunting season where you can hike and enjoy the outdoors without fear of being hit by bullets.
Letter: 576 Hunters too pose a problem for us backpacking as we have few places to go in Nov and Dec where this isn't a concern
Letter: 651 I believe hunting and fishing opportunities should be improved
Letter: 1388 Hunting traditions of many East Texans will have to be controlled and changed This will require strong law enforcement
Letter: 1453 Hunting is promoted and accommodated too much It is dangerous and somtimes lethal to other users of the forest
Letter: 1605 A substantial area should be set aside from hunting in each ranger district
Letter: 1679 Balance hunting with other forms of recreation, don't allow hunting in all parts of the forest

Issue. 10-4 Hunting

Letter. 1723 (MA-8c-05) I am opposed to hunting unless there is a confirmed overpopulation

Response: Comment noted

Letter: 1605 All NF land should be Type II hunting, and should be managed better for squirrel and wild turkey

Response: An enormous effort has been made by TP&WL, USFS, NWTF and private industry to stock and manage wild turkey in East Texas It is working

Letter· 1723 (pg 40 DEIS) Alt 4b does not provide the old growth that is good for hunting as well as the undisturbed areas that allow wildlife less disturbance

Response· OG areas are being considered, areas are being evaluated for their OG criteria, spacial orientation, etc

Letter: 1723 How will you resolve the hunter and other users conflict? How about having a no hunting zone so others can use the NFs safely during hunting season?

Response This might be considered for the final Plan Hunting is a short duration activity, while other uses may occur all year long

Letter: 1807 Control hunting violations by restricting the number of hunters and no guns allowed, except by hunting permits during season

Response: The Type II hunting areas are working toward this type of management

Issue 10-5 Law Enforcement

Letter 1605 More law enforcement is needed throughout the forest,

Response. Comment noted

Letter 1807 Give local Game Warden's permission to help control hunting and fishing violations

Response: The hunting and fishing is controlled by TP&WL and state game wardens are the primary law enforcement control of hunting and fishing on NFT FS law enforcement may also enforce state hunting and fishing regulations on NF

Letter 887 increase the law enforcement manpower not closure One law enforcement officer for the entire Raven district is simply not enough

Response We agree Due to budget constraints, we're searching alternative means to maintain a strong, visable presence on the NF

Letter: 1600 FS law enforcement cannot enforce the current special use areas A small group of outlaw riders will always ignore any closed area regulations No mention is made in the Use Plan of an increase in law enforcement funding

Issue: 10-5 Law Enforcement

Letter 1613 the Forest Service's main concerns were erosion along the pipeling right-of-way, When it was pointed out that ORV's should not be causing the erosion on the pipeline since riding on it is illegal, the response was that the FS could not adequately enforce the law, and some "outlaws" were riding on the pipeline and causing the erosion The obvious answer to this problem is more law enforcement presence

Response: Though law enforcement funding may not increase, you can help by documenting illegal activities & letting FS law enforcement officials know of these activities

Letter. 1644 some method of enforcement of regulations concerning vandalism by the use of firearms would be a worthy consideration

Response: We're constantly on the lookout for those people illegally discharging firearms However, because we cannot find all those conducting illegal activities, we ask for your help in identifying those engaging in illegal activities

Letter: 1670 The lack of law enforcement personnel on the National Forests is also appalling There should be less foresters so the agency can hire qualified people to protect the public lands and inholders from criminal activity

Response: Foresters develop and nuture your forests Law enforcement protect your forests Both are vital to the NF

Issue: 10-6 Cultural Resources

Letter: 959 No evidence is presented in either the DEIS (pp 205-210) or the LRMP to evaluate NFGT's contention that archeological and historic areas are "the most significant archeological sites yet discovered on the NF in TX" (LRMP, p 196) I would recommend that the final EIS and LRMP add this supporting evidence so the interested public can better evaluate the relative merits of these management area selections

Letter: 1309 FW-142 - calls for ORV use to be limited to prevent damage to natural resources We would wish to include cultural resources

Letter: 1309 MA-1-52 - calls for allowing ORV use both on and off permanently marked trails We believe that ORVs can damage archeological site and urge the FS to limit their use to marked trails

Letter: 1309 The plans to restore the Lake Fannin Organizational Camp to its original state fall along the lines of the on-site discussion held between the FS and SHPO on Nov 9, 1994

Letter: 1723 (pg 209 DEIS) I am opposed to the no project specific consultation and compliance plan you have worked out with the SHPO I do not agree with categorically excluding from the normal compliance process half of the remaining forest acreage from cultural resources investigations

Response: Comment noted

Letter: 3 I didn't find any evidence that archaeology is addressed in the Summary of the Draft EIS for the RLRMP dated September, 1994 my concern is that the recording and preservation of prehistoric and historic sites need to be further emphasized

Response. Details are in the EIS and FP

Letter. 1128 The phrase "Complete a Cultural Resource Inventory" with variations occurs on pages 60, 134, 139, 151, 162, 168, 177, 191, 201, 214, 218, and 223 The type of inventory should be specified, i e "100%" Inventory, or "100%" Archeological Survey"

Response: "Complete a Cultural Resource Inventory" is synonomous with "Completing Consultation with SHPO", per 36 CFR 800 4-800 6, and the R8PA, Forest level MOU, and HRM

Issue: 10-6 Cultural Resources

Letter: 1128 Pages 205-210, The "Programmatic Agreement Concerning the Management of Historic Properties on NF Lands in the Southern Region" and the MOU under discussion (but not yet signed) with the TX SHPO should be presented in an appendix since they both are key documents in the management of cultural resources in NFGT

Response: These documents are incorporated by reference and do not need to be appended We would by happy to provide copies to the BLM, if they should desire copies

Letter: 1309 The questions proposed for monitoring implementation, effectiveness, and validation of the Heritage Management Plan are appropriate, but who will be doing the monitoring and how often? The final version of the Heritage Management Plan should specifically address this issue

Response: Recent revisions to the Heritage Management Plan incorporating comments from Advisory Council for Historic Preserverance have addressed this issue

Letter: 1309 FW-45 - This statement is too broad and fails to reflect that thought has gone into the selection of areas that will be surveyed The statement should note that these surveys will follow the compartment prioritization plan described in the Heritage Mgt Plan This would clarify that only certain areas considered to have a high potential for containing historic properties will be surveyed

Response: This Forest-wide was rewritten to reflect survey strategies and prioritizations in the Heritage Management Plan

Letter: 1309 FW-82 - permits temporary group events on NF lands. Please note that all activities by such groups should be limited to areas that do not contain significant cultural resources The use of the forest by the Rainbow People in 1992 led to damage as a result of digging latrines on an important historic site

Response: Site/event specific analysis will be conducted prior to permit issuance to ensure that the proposed activity will not impact significant cultural resources

Letter: 1309 (MA-8a-11) This statement is not consistent with the MOU and Heritage Mgt Plan Under the terms of the Heritage Mgt Plan, RNAs would be surveyed whenever they fall within the compartments selected for intensive survey

Letter: 1309 MA-10a-21 - should be revised to include evaluation of inventoried resources in consultation with SHPO Section 106 responsibilities cannot be completed simply by inventorying the resources

Response: This S&G was rewritten to reflect direction of the Heritage Management Plan

Letter: 1309 MA-8e-03 - directs that historical and cultural characteristics be protected through boundary definition and signing Studies have shown that signing actually increases vandalism of archeological sites We recommend that sites be recorded and protected, but not marked with signs.

Response: Signing will be limited to boundary signing, it will be vague enough to not identify the presence of cultural resources, on the designation as a Special Management Area

Letter: 1309 Overall, the standards set forth for the protection of cultural resources seem to [be] adequate However, for some standards, it is not clear who will be taking the lead or when some of these actions are planned For instance, MA-8f-42 states that the FS will acquire private holdings to enhance the value of these special areas and MA-8f-61 states that the FS will negotiate for the purchase of reserved mineral rights to protect cultural resources from the exercise of these rights We believe that these standards could enhance cultural resources and should be pursued Will the Forest Archeologist be responsible for initiating these actions through the land acquisition department?

Response. The Forest Archeologist, coordinating with the lands acquisition staff, will review proposed acquisitions The lead in initiating acquisition is always the Lands section

Letter: 1723 FW-041 - a survey is needed for each NF for cultural resources you are abdicating this responsibility and I object

Issue: 10-6 Cultural Resources

Response. This standard states cultural inventories will be completed for all projects involving ground disturbing activities This FW standard is applicable to all Forest Service lands in Texas

Letter: 1723 FW-043 - you need to tell what these guidelines say so the public can comment on their adequacy

Response: This standard has been modified Marking of cultural heritage sites is sensitive, broad dissemination to the public on marking of sites may be counter productive & damaging to the resource We work directly with SHPO to develop these programs

Issue: 10-7 Visual Quality

Letter: 1438 Having worked and recreated in three of the four national forests in Texas, I have found them to be not only aesthetically pleasing but also very productive areas for the production of timber It also seems to me that older age classes dominate the landscape Alt 3 seems to allow the harvesting necessary to manage this dynamic system

Letter: 1723 (MA-2-61) I am against cutting understory vegetation in the guise of visual quality

Letter: 1723 (MA-2-63). .you need to describe what the VQO Handbook says about "visually sensitive areas to maintain or enhance the visual resource "

Letter: 1723 (MA-1-61) .partial retention is not good enough. Full retention is needed

Letter: 1723 (MA-1-62) you must replace the word "may" with "must" in regard to special mitigation

Response: Comment noted

Letter: 1433 the plan calls for the retention of visual quality along highways and roads and maximum modification in other areas Scenic value maintenance and enhancement must be practiced on the entire forest

Response: It is or should be practiced on all of the NF There are just different levels of concern and need to be concerned with different levels of mitigation to meet those concerns

Letter: 1453 Visual screens along roads and trails should not be permitted (Plan pp 73-75, 90,102)

Response: There are no screens along roadways proposed in the FP

Letter: 1453 Facilities planning should incorporate xeriscape landscaping with native species The only descriptive discussion of landscape materials that I found applied just to MA 3 and only endorsed "natural appearing landscapes" which is vague and noncommital part covering Semi-Primitive Recreation Sites, include no note of whether planted trees will be exotic or native, water-dependent or xeric

Response: Native plants are proposed for areas that are planted

Letter: 1605 . the VQO section specifically supports the alternatives using even-aged management arguing that they "would present more variety and provide longer views into the forest" The VQO section is blatantly biased It's purpose must be to counteract negative comments on the visual appearance of clear cuts, seed tree cuts, etc

Response: *The statements are only intended to present a relative distance between different management schemes Even under one type of management, such as* uneven age management, there may be differences, depending how that management is accomplished Burning verses chemicals verses hand treatment all provide different viewing opportunities

Issue: 10-7 Visual Quality

Letter: 1671 The forest wide standards for aesthetics should state that oil and gas structures should be placed in previously cleared or disturbed areas and as close to roads as possible in order to minimize impacts and fragmentation

Response: Actually, we have very little to do about determining location of drilling rigs They are located according to information they get from doing seismic surveys locating oil and gas deposits and the geologic information they gain from that dictates rig location

Letter: 1723 (pg 200, DEIS) there are zero acres of MA-4, Streamside Zones left in preservation you can cut in every acre of streamside zone

Response: The purpose of streamside zones is not to set aside and not manage, it is also not to manage for timber Purpose is for management for wildlife and recreation and to protect streams

Letter: 1723 You make a big deal about Alt 6 & 7 not being able to see farther into the forest this depends totally on the type of forest and type of activities allowed Because of longer rotations and closed canopies for Alt 6 & 7, you will have greater vistas and scenic vegetation because the closed canopies will shade out understory plants

Response: You are totally correct when you say types of activities and type of forest allowed Without some type of understory management to control, understory views from roads will be limited to very short distance in East Texas

Letter: 1723 (pg 202, DEIS) you should never clean-up snags since these are part of the natural forest scenery

Response: Depends where it is and how much That's why the forest is zoned into areas of different visual concerns In some areas, snags are more acceptable than in others

Letter: 1808 We recommend the NF in Texas continue to locate wells and pipeline right-of-ways in existing openings and to locate these facilities along major roadways The USFS, historically, has located wells further into the forest to maintain the visual quality along roadways However, we believe it is more important to reduce forest fragmentation than to maintain visual quality

Response Visual quality is an important factor for the visiting public They prefer not to see these facilities from roads or trails They normally provide a relative short period of opening and create edge and habitat for different wildlife than deep forest

Letter 1723 I am very concerned that you are allowing so much land to be given over to the modification and partial retention categories (pg 201, DEIS) that there will be clearcuts and other even-age variants all over the forest destroying the scenic quality, not enhancing it

Response: The EIS addresses on range of alternatives with varying degrees of VQO's

Letter: 1723 MA-8f-71 - it is semi-primitive nonmotorized that should be emphasized so that access is reduced

Response: We have in fact changed some areas such as Old Aldridge Saw Mill site

Letter: 1723 (pg 46, LRMP) visual qualities must not be used as an excuse to cut wood by saying that this results in enhancement of views and scenic qualities

Response: This is on page 47 Vegetative mgmt can be accomplished by using techniques that open views, look natural, & provide variety

Letter: 1723 (MA-2-62) you must, no may, require special mitigation

Response. We can't say you "must" require special mitigation without knowing if it is needed

Letter: 1723 (MA-4-91) adjacent management has nothing to do with the protection of riparian areas You always need retention with these areas

Issue: 10-7 Visual Quality

Response: Adjacent areas are always an influence on the areas that they are adjacent to

Letter: 1723 FW-054 - what are the scenic standards that are used for roads? You should detail them here so the reviewer will know what you are talking about and can decide if they are sufficient

Response: Different roads, different locations, & uses would have different standards

Letter: 1723 MA-5-81 - I also oppose . which allows cutting of timber This will be used as an excuse to log areas that otherwise would not be touched due to environmental sensitivity You contradict best management practices by saying you want to cut to maintain or enhance visual quality

Response: The IDT disagrees

Letter: 1723 (MA-3-76) partial retention is not good enough along highways There must be some areas that deserve full retention so that the scenic quality of the area can be protected What areas are these?

Response: Partial retention implies areas that will have both retention & partial retention VQO

Issue: 10-8 Interpretive Services

Letter: 1723 (pg 38 DEIS) intrepretive needs should change if the emphasis changes to less commodity production and more environmental sensitivity Therefore the interpretive needs should be different for each alternative

Response: Comment noted

Issue 10-9 General

Letter: 1605 Canoeing recreation could be more sufficiently addressed

Letter: 1627 Alternative 2 provides more trails and recreation opportunities for low-impact hiking and canoeing while providing some increase in higher-impact horseback riding and bicycling Fewer developed sites associated with that alternative releases funds for needed improvement of existing sites Hunting related conflicts may be decreased

Letter: 1723 I am totally against FW-136 because it will allow usage of guns almost anywhere in the NF I want areas where no hunting is allowed so that recreation can occur without fear of death

Letter: 1768 Our club is one of several bird dog field trial clubs in the North Texas area We are in need of permanent trial grounds which we could help develop Our club is interested in utilizing areas 29, 30, 74 and 74 (Grasslands) to develop 3 one hour horse back courses This would also be very advantageous to the horse back riding clubs because we will eventually strive to have a pavillon, horse stables and permanent toilet facilities built

Response: Comment noted

Issue: 10-9 General

Letter: 1605 The entire forest should not be closed off to all other recreation for three months of the year during hunting season

Response: The forest is not closed to recreation use any time of the year, except those uses such as hunting Hunting seasons are regulated by the State of Texas

Letter: 1723 Under the ROS you are again playing too much to those who will drive through the forest or want a more urbanized forest experience like ORVs and developed campgrounds there are very few places .where you can get away from people and enjoy solitude and quiet You never discuss how this conflict can be overcome

Response: It's all relative to the public as a whole, as to the activities and development level they prefer

Letter: 1723 Kelly's Pond has been abused by ORV use It needs to be restored and maintained to standard

Response: It has also been used by other user groups

Issue: 10-10 Shooting ranges

Letter. 1236 Shooting ranges - the FS preferred alt has one in each forest

Letter: 1309 MA-3-74 - call for the development of shooting facilities on the grasslands and limiting firearms use to such facilities except for shotguns and blackpowder arms used for hunting We urge the FS to proceed with construction of such a facility on the LBJ National Grasslands, where recreational shooting in a gully has led to partial destruction of a lime kilm site that we believe is eligible for inclusion in the National Register of Historic Places

Letter: 1644 The use of firearms in these areas (grasslands) is of major concern to me Due to the extreme danger involved with the use of high powered rifles, I am extremely grateful for the elimination of the use of these rifles on the grasslands

Letter: 1723 want specific shooting ranges that are only in designated areas with no other shooting except during actual hunting allowed

Response: Comment noted

Letter: 1237 The idea of cutting trees for a shooting range is outrageous

Response: It is possible not all shooting range locations would require cutting trees

Letter: 1310 I would wholeheartedly support shooting ranges if I thought that would draw all the target shooters

Response: It probably would not stop all random shooting but, it would make a positive difference

Letter: 1433 No shooting ranges should be built It doesn't make sense to tear down forest to build shooting ranges

Response: It does, if you are a shooter and are restricted to target shooting at a range

Letter: 1601 The following comments are offered in regards to the plan 1) Interest for recreational shooting ranges has been expressed by the public; 2) Shooting ranges, when managed, will generate revenue; 3) Range development will allow maximum multiple-usage of public lands Although not stated in the summary, it is hoped the Forest Service will insure the inclusion of recreational shooting facilities in the Land Management Plan

Issue: 10-10 Shooting ranges

Letter: 1605 Shooting range development should require an analysis of the effects of lead accumulation in the soil at the sites
Letter: 1640 For shooting ranges the impact on wildlife is greater for 4B because 2 more are proposed than in alt 6. Alt 6 would be better for wildlife
Letter: 1723 I believe that designated shooting areas and ranges need to be provided and that all shooting outside of these areas would not be allowed
Letter: 1723 (pg. 134, DEIS) ...problem with shooting ranges that needs to be taken care of is their location and safety All shooting ranges need specific standards and guidelines that apply to them to ensure their safety.
Letter: 1767 .shooting ranges are not a good idea unless they can be manned and properly handled to provide safety for everyone

Response: The FS is planning some type of shooting range facility It has come to our attention that there is probably more environmental effects of concentrated shooting areas than we had originally considered Whatever is planned will take detailed planning and design and will require a more costly facility than originally planned

Issue: 11 RESOURCE SUSTAINABILITY

Issue: 11-1 Clean Air

Letter: 1632 It should be noted that on even the most severely degraded and eroded soil, pines will sprout and grow

Response. Comment noted

Letter: 1632 I support adoption of a 300 ft wide standard forest wide to assure not only maintenance of water quality and wildlife-related food chains, but also to reduce or eliminate increased blow down associated with adjacent timber harvest.

Response Water quality is maintained on the NFGT by implementing S&G that require protection zones adjacent to those streams that are identified as needing protection Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality In some situations, wider protection zones would be beneficial to wildlife and provide greater protection against blow-downs

Letter: 1632 Guidelines should prevent regeneration cuts that surround headwaters or straddle both sides of a drainage

Response· Streams that are identified as needing protection (SMZ) will have a protection zone in which management activities will be modified Regeneration cuts will be allowed for reasons other than timber protection A minimum amount of surface disturbance will occur Therefore minimizing impact to water quality and soil productivity

Letter: 1632 I specifically recommend that continuous cover be maintained in all stands adjacent to SMZs by using only single tree selection Single tree selection provides a "buffer" and still allows for timber production

Response: This is a good recommendation if water quality was the only issue we have to manage Various stands need a specific method of cut to meet the various requirements for T&E species and to meet the risk reduction factor for SPB

Letter: 1632 The erosion/sedimentation rates associated with App F and actual past NF practices have resulted in and will continue to result in deterioration of water sheds and water quality Acceptable soil losses should be lowered considerably below Plan levels to better reflect multiple resource management

Issue: 11-1 Clean Air

Response: All management activities allowed on the NFGT produce erosion rates below soil loss tolerance levels except access roads and soil traits S&G will prevent any long term adverse to soil productivity and will protect water quality

Letter. 1632 activities such as timber harvests and heavy equipment operation should be excluded from SMZs the Plan suggests timber harvesting will be used to restore or enhance SMZs The FS should resist notions of "fixing" MA-4 by subjecting it to further site disturbance Adjustments in canopy composition through logging will not accelerate the holistic resoration of the site, considering impacts to soil, water, midstory, and understory

Response: S&G will not allow indiscriminate timber harvesting activities within SMZ's

Letter: 1680 Public surveys consistently show that most Americans don't think we have gone far enough to protect . air .

Response: The FP meets all the regulatory requirements by the State of Texas for clean air

Letter: 1723 wilderness vegetation is sick and is dying due to ozone pollution and you do not address this in this plan

Response. There is no research data to substantiate ozone having an adverse impact on vegetation in East Texas.

Letter: 1723 (pg 122 DEIS) there is no TACB anymore The agency that should be cited is the TNRCC. It is of great concern that no real air quality monitoring is ongoing in the NF

Response: Making reference to TACB was an over sight Air quality monitoring is conducted on the NFGT with PM10 monitoring device

Letter. 1723 (pg 165 DEIS) there are very few air quality rules regarding oil and gas drilling requirements in Texas and under the Texas Clean Air Act drilling will be done in accordance with state and federal air laws means nothing There are not enough investigators to go out and ensure that all air pollution rules are being met by drillers So how do you know that such activities are currently being done according to the law?

Response: There is an individual on each district that provides assurance that all oil and gas operations follow all regulatory requirements

Letter: 1723 For burning on NF lands you need to educate adjacent property owners and the TNRCC about the importance of fire

Response: We agree with your statement

Letter: 1679 The Draft FP doesn't consider the affects of FP actions on global warming or air quality There is no plan for monitoring for air quality The Draft FP does not reflect impacts on the forest under various climatic change scenarios The Draft FP doesn't address the impacts on climate of massive even-age management

Response: We have one baseline water quality monitoring station for each NF We have collected baseline data for more than 15 years on the NF Our objective on the Grasslands, from a watershed perspective is to abate nonpoint source pollution (sedimentation) This is done by implementing watershed improvement plans These plans are designed to control water yields An area that is restored is monitored to ensure the objective has been accomplished

Issue: 11-2 Soil Productivity and Water Quality

Letter: 1462 it appears that all alternatives try to minimize erosion or other disturbances, none would be worse than present conditions, and the leading alts would be similar

Issue: 11-2 Soil Productivity and Water Quality

Letter: 1637 By closing the open riding area it will put greater pressure on the PMT that will cause more damage and erosion than what is already occurring Due to the type of soil in this area the trails are self healing when riding pressure is kept low, by spreading out the riding area damage and erosion are kept to a minimum
Letter: 1640 In alt 6 wildlife will have a cleaner water supply because erosion would be less (than alt 4B)
Letter: 1723 (MA-3-35) remove "to the extent practicable" This is a weasel phrase Since you already say "you will encourage" you have enough flexibility built into this sentence
Letter: 1723 (MA-4-01), powerline, pipeline, road and other corridors must not be allowed to cause sedimentation.
Letter: 1723 (MA-9b-133) 33% is too much, only allow 15-20%

Response: Comment noted

Letter: 368 I want streams to be better protected
Letter: 388 streams, which make our public forested land most attractive to an urban population are INADEQUATELY protected and conserved
Letter: 848 We believe there is particular urgency in controlling cutting and burning within 150' of streams
Letter: 861 small streams are destroyed by the soil erosion occurring while the new trees grow
Letter: 984 Thanks for considering my opinion We need to think seriously about our water quality in Texas as our state population grows
Letter: 1310 SMZ widths of 100 feet for perennial streams, 66 feet for intermittent streams and 33 feet for ephemeral streams are inadequate
Letter: 1313 At least 200 feet from perennial streams should be protected from logging and burning
Letter: 1605 SMZ widths of 100 feet for perennial streams, 66 feet for intermittent streams and 33 feet for ephemeral streams are inadequate

Response: Water quality is maintained on the NFGT by implementing S&G that require protection zones adjacent to those streams that are identified as needing protection Research has shown that protection zones from 30 to 60 feet wide are adequate to maintain water quality In some situations, wider protection zones would be beneficial to wildlife and provide greater protection against blow-downs

Letter: 336 The logging and erosion problems either from logging or RV's need to be addressed before the water quality becomes worse I have flown the North West in my plane and have seen what large area cuts do Salmon will in my lifetime probably become endangered or extinct
Letter: 1605 Streams need to be protected by reducing erosion

Response: Streams that are identified as needing protection (SMZ) will have a protection zone in which management activities will be modified Regeneration cuts will be allowed for reasons other than timber protection A minimum amount of surface disturbance will occur Therefore minimizing impact to water quality and soil productivity

Letter: 1632 Soil and water resources are declining as a result of erosion and siltation, respectively

Response. S&G will not allow indiscriminate timber harvesting activities within SMZ's

Letter: 354 Every other agricultural crop depends on crop rotation (biodiversity over time) to maintain/improve soil conditions Pine farming does not do this
Letter: 1460 I am concerned that continued pine-plantation mgt methods are not sustainable--especially for soil quality Most agricultural crops are grown using crop rotation in the fields This represents biodiversity over time Continued pine monoculture methods, now well into the third generation in Texas, are bound to reduce soil quality Tree's resistance to disease and pest problems will also be reduced

Response: This is true for every agricultural crop except trees Between rotation of tree crops annual vegetation is continuing to build organic matter in soil therefore, maintaining and or inspiring soil productivity

Letter: 855 tax dollars are lost through erosion

Issue 11-2 Soil Productivity and Water Quality

Response: This is true, erosion has a direct effect on soil productivity and water quality Implementation of S&G will minimize soil loss on the NFGT

Letter. 1158 My experience in crossing streams in this area is that the stream bottoms are highly compacted sand which generates negligable suspended solids when crossed by an ORV Any purported silting problems in Boykin Lake are not a result of ORVs crossing streams, but are the result of aggressive road building and logging in this area

Response: We agree that some streams have eroded down to sandstone bedrock. However, there are some stream segments that have mudstone or shale parent material This material is much finer than sandstone and has a tendency to have a continuous erosion process Our on-the-ground inspection of the Boykin Spring watershed shows signs of soil movement caused by several management activities including ORV use

Letter: 1243 Massive clear cuts and ORV's going off established trails will destroy the sustainability of this piece of our Texas heritage.
Letter: 1310 Soil productivity is not adequately protected in even-aged management

Response: Research has shown that clearcutting does not have long term adverse effects on water quality and soil production if S&G are properly implemented

Letter: 1310 Why do forest streams run red or dark brown after rains, laden with silt, if not because of the maze of roads?

Response. Roads constructed on highly erosive soils can cause sedimentation if S&G are not implemented

Letter: 19 Clearcutting causes erosion of top soil (that accumulates very slowly at best) and gullying. Stream are loaded with silt that destroys native flora & fauna Run-off is accelerated which reduces replenishment of ground-water which we desperately need

Response: Research has shown that clearcutting does not have long-term adverse effects or water quality and soil productivity, if S&G are properly implemented. Not all streams are loaded with silt, although there are problems in some watersheds The problems are very complex and sometimes out of the control of the FS The FS has hired a full-time hydrologist to monitor and address these issues Accelerated runoff will only effect ground-water in those areas that are recharged for ground-water

Letter· 1310 What will be the effect of massive soil contamination with lead in the concentrated area of a shooting range? The EIS needs to look at that

Response The majority of the area where shooting takes place on the NFGT has acid soils Acid soils contain elements with negative ions. Lead is an element which also has negative ions Elements with like charges will buffer each other Therefore, an exchange of ions will not occur The lead in soils on these areas will not have an adverse impact on the environment

Letter. 1453 Alt 4B required insufficient erosion control from timber purchasers MA1 and MA2, the FS plans on requiring the timber operators maintain erosion control structures until 70% of the area is revegetated or up to 1 year, presumably whichever comes first... Timber purchasers should be required to maintain erosion control measures until the area is revegetated and to post bond that they will indeed follow through on this commitment They must be held responsible for the erosion and soil loss that they cause

Response· It is very difficult to get 100% ground-cover on any area that's void of vegetation within one growing season. The 70% ground-cover is a realistic figure In conjunction with surface water central structures (water-bars and terraces), 70% ground-cover will recover soil loss from the area.

Letter: 1453 it contains no endorsement of nor implementation plan for the water quality antidegradation mandate found in the Clean Water Act In fact, the siltation associated with . even-aged cuts is likely to continue to degrade regional water quality
Letter· 1680 Public surveys consistently show that most Americans don't think we have gone far enough to protect . water quality .

Response: Forest wide S&G meet state approved BMP's which are designed to meet the mandate of the CWA.

Letter· 1632 Minimum protection standards should be mandated for ephemeral streams since elevated flows and sediments in ephemeral streams leads to bank scour and siltation in SMZs below

Issue: 11-2 Soil Productivity and Water Quality

Response: Protection zones for ephemeral streams are discussed under Forest-wide S&G

Letter: 1632 I oppose the further construction of wildlife ponds and greentree reservoirs East Texas bottomlands have declined 60% since presettlement times. Further alteration or inundation of existing bottomland hardwoods is undesirable ....small ponds eliminate stream habitat, eliminate site-sensitive plant communities, and concentrate wildlife use in sensitive areas leading to resource damage Sufficient ponds already exist for this planning period

Response: Recent forest direction limits the number of ponds that will be constructed.

Letter: 1723 FW-182 - is too permissive It allows about one-third of the area to have ruts 6 inches or deeper This is massive damage and must not be allowed.

Response: The IDT is not aware of any documented research to support this.

Letter: 1723 (FW-022) you need to require that when you re-establish ground cover after logging that you "require" and not "encourage" the use of endemic/native species

Response: This standard has been clarified in the final document

Letter: 1723 (pg 80-81, Plan) the standards set for ephemeral streams are much too inadequate to really do wildlife any good. .. these corridors at least 75 fts on both sides of the streams.

Response: Ephemeral streamcourse protection is to ensure water quality is maintained The FW standards were adequate for this purpose

Letter: 1632 Timber harvests under EM should not be so unreasonably high or frequent as to result in degrade of soil and water resources in order to recruit regeneration Severe soil disturbance related to mechanical site prep has no equivalent in nature and this practice should be discontinued in favor of improved soil and water quality and natural plant communities

Letter. 1653 I can assure you any so called "damage" to the environment, by all of the people around Broaddus, would PALE and be nothing, to compare to the damage done by the loggers just getting timber out of one "Bug Cut"!

Response: Management Area S&G require compliance with State BMPs to ensure protection of soil and water quality

Letter: 1467 It has been suggested that ORV use may cause a violation of the Clean Water Act Before banning ORV's, you must consider how much damage a single logging operation does to a section of our National Forest

Response. Logging operations are monitored, both during & after the activity is complete CWA requirements are monitored with great regularity ORV users must also be accountable for their actions

Letter 1723 (pg 39 DEIS) Alts 1-4b should cause more water quality impacts and loss in soil productivity Not less Please document your assertion

Letter· 1723 (pg 92 DEIS) it is a ridiculous assertion the Alts 6 & 7 could "significantly reduce flows " Alts 6 & 7 have the widest corridors and will retain water the best and allow it to recharge groundwater aquifers since we are talking more OG there should be less evaporation of water from the stream due to shading and cooler temperatures or at least more stable temperatures

Response: We are in agreement with this statement and it is basically stating what we have stated. There will be less harvesting in alternatives 6 & 7, wider SMZ's, therefore more water will infiltrate, decreasing run-off thus reducing stream flows

Letter: 1723 (pg 118 DEIS) I disagree that Alt 4b will have the least impact of soil productivity Alt 6 does not use any even age management and has the longest rotations The roads used are smaller and less traveled Alt 6 should get less erosion because no site preparation or clearcutting occurs Alt 6 & 7 have the lowest tons of sediment resulting from management activities It is ridiculous to say that Alt 1 has less tons of sediment than Alts 6 & 7 Alt. 1 has all even age management for much of the forest and site preparation and more permanent roads.

Issue: 11-2 Soil Productivity and Water Quality

Response: We agree, alternative 6 has more wilderness acres and would not have the same level of timber management alternative 4b

Letter: 1723 Alt 1 is allowing the violation of State water quality laws now because ORVs are causing nonpoint source pollution as are powerline ROW erosion, fire breaks in riparian areas, SPB logging across creeks, and other problems

Response: We agree, without mitigation on stream approaches and crossings, we could be in violation of state water quality Standards

Letter· 1723 (pg 121 DEIS) you have no water quality monitoring baseline yet you are going to permit ORV's in areas that admittedly have very erosive soils You will never be able to say you have baseline numbers because you will cause erosion before you start water quality monitoring What is your water quality monitoring plan for the grasslands and when do you plan to start?

Response: We have one baseline water quality monitoring station for each NF We have collected baseline data for more than 15 years on the NF Our objective on the Grasslands, from a watershed perspective is to abate nonpoint source pollution (sedimentation) This is done by implementing watershed improvement plans These plans are designed to control water yields An area that is restored is monitored to ensure the objective has been accomplished

Letter· 1723 (pg 14 Plan) - you say there has been no adverse soil and water impacts but I have seen erosion 5-6 feet deep So there are impacts

Response: The statement is pertaining to no adverse impact from not completing as much soil and water inventory as was planned And no adverse impacts to soil and water values

Letter: 1723 (pg 117 DEIS) - soils that are wet or compact easily or in other ways are damaged by logging are ignored here

Response: This section of the DEIS, addresses the affected environment The discussion on soils is pertaining the range of soils on the NFGT We do reference those soils that have clay at or near the surface that have server compaction hazards Wet soils were not specifically mentioned but are included within the range of soils shown

Letter 1723 (pg 149 DEIS) you say nothing about how many spills of oil or salt water or other pollutants are expected and what has occurred in the past and what damage is expected Water quality problems are completely forgotten here

Response Precautions are taken at all oil and gas operations to prevent spills There is no way that we can predict the number of spills that may occur There have only been a few spills on the NFGT

Letter: 1763 any measures to improve water quality in the Neches River would benefit the aquatic and wetland ecosystem components within the Neches River Corridor Units of Big Thicket National Preserve

Response: We agree with this statement

Letter: 1808 Part II(a), Soil Productivity, p 117-119, and Part 11(b), Soil Productivity, p 165-166 The discussion that soil productivity is low in the NFGT is misleading Soils in these areas are naturally low in potassium and phosphorus, except in bogs and some riparian areas This discussion leads the reader to believe that forest management practices will not affect the soils in the NFGT because they are already low in productivity In fact, timber harvesting continues to reduce soil productivity because the nutrients which are tied up in the trees have been removed, therefore, these trees can no longer contribute to the leaf litter and subsequent detritus build up in the soil and nutrients required by aquatic organisms This section should be rewritten to reflect the correct perspective

Issue: 11-2 Soil Productivity and Water Quality

Response: Most nutrients in trees are found in the leaves, roots and small branches which are left on the forest floor after harvesting The majority of available nutrients are within the topsoil which is left in place after harvesting Thus we have taken the position that harvesting does not have a long-term adverse effect on soil productivity

Letter: 1808 Glossary, p 235 The definition for "filter strip" should include a minimum width of relatively undisturbed vegetation to be retained The silvicultural forestwide standard (FW-171-23) in the Draft Revised Land Management Plan, chapter IV, p 79, states that the filter " strip's width in feet is at least 30 plus 1 5 times the percent slope " The definition should be consistent with this standard

Response: The definition for filter strip in the glossary is based on a concept The actual width of the strip will be determined by site specific analysis and the character of the stream course

Letter 1507 there have been no definitive studies whereby ORV users have impacted or violated the Clean Water Act of the US

Letter. 1600 Much has been made by the FS of soil erosion and ORV use in the southern Angelina Currently, there are over 300 miles of ORV trails on the ground in the southern Angelina The vast majority of this trail system complies with Forest-Wide Standards and Guidelines FW-140, FW-141 and FW-148 In the Draft Use plan appendix F Table 1 there are listed various erosion and sediment coefficients for different activities ORV trails are not listed which makes me think that no valid research exists showing an erosion problem caused by ORV use

Response There are no definitive studies to show that ORV use is violating the CWA Sediment is considered to be a nonpoint source of pollution The State of Texas does not have a quantitative standard for sediment Therefore, any activity that allows excess sediment to enter a stream course, without implementation of mitigation, would be a violation of state WQS which is a violation of the 319 section of the CWA

Letter: 1613 ORV use is a minor contributor to sedimentation of stream channels compared to routing logging operations, and the associated road building and heavy machinery used Forest Service personnel expressed concern over a sand bar that has appeared in Boykin Lake, and insinuated that the sand bar was caused by erosion due to ORV use However, upon further discussion, the main drainage into Boykin Lake is an area that sees very little ORV use

Response: Any and all soil disturbing activities have the potential to cause erosion and produce sediment The sand-bar in Boykin Lake was created by sediment moving from unstable stream channels, our oil and gas pipeline and gullies at stream crossings used by ORV riders There is evidence of a great deal of ORV use within the Boykin Lake watershed

Letter. 1605 Roads change the water flows within the forest This can lead to erosion and leads to higher water yields The cumulative effects of higher water yields causes stream channeling and destruction of habitat in stream banks These effects lead to increased siltation of the streams and rivers

Response: It is true that removal of vegetation from upland sites will cause an increase in water yield However, most suspended sediment will be trapped by the protection zone (SMZ) for each stream or drainage that is designated for protection Therefore, siltation from the uplands is held to a minimal There is not a great potential for damage caused from the use of herbicides because herbicides used on the NF are not soil active Although removal of vegetation will cause an increase in water yield There's not enough vegetative manipulation in any given watershed that would result in flooding

Letter: 1723 (MA-9a-134) 33% soil compaction is too much to allow You need to drop this to 15-20%

Response: This is refering to developed recreation sites that have been removed from the suitable land base

Letter: 1723 MA-2-75 - this standard is not measurable Define "retain enough duff and vegetation to maintain a healthy forest ecosystem and ensure adequate nutrient cycling" What is adequate nutrient cycling? This is subjective and must have a measurable standard

Response: Soil productivity is maintained by retaining the mineral layer of the soil surface Any amount of duff retained will ensure the retention of the surface layer, thus maintaining soil productivity

Issue: 11-2 Soil Productivity and Water Quality

Letter: 1839 Due to the general nature of the activities included in the proposed land and resource management plan, we are unable to determine from the DEIS whether the Department of the Army authorization would be required However, several types of activities discussed in the DEIS may require authorization if they occur in waters of the US, including wetlands Examples of ground disturbing activities that may require authorization where they occur in waters of the US include, but are not limited to, some timber harvesting and related timber management activities that are not part of an established operation, construction of roads, trails, and recreational facilities, construction of oil and gas exploration wells, access roads, and production facilities; and excavation of sand, gravel, and rock

Letter. 1839 When a specific project that would require Dept of the Army authorization is proposed, please contact our office and provide us with the details of the proposed work, including the type and amount of material, if any, to be discharged (both temporary and permanent discharges) into waters of the US, the location of any work or discharges, and appropriate plan and cross-section views of the proposed work We understand that in many cases the USFS would not be the party responsible for obtaining Dept of Army authorization In these cases, we would encourage you to inform those coming to you for permits and/or information that they may need to contact the USACE regarding authorization under Section 404 and/or Section 10

Response: All silvicultural activities conducted on the NFTX are standard practices that are permitted under 404 requirements

Letter: 1605 MA-3-06/07 - Revegetation with non-native species should be used and justified on a case basis only, and only when no reasonable native alt is available When non-native species are employed, a clear schedule for restoring native plant communities must be developed prior to the use of the non-natives

Response: The IDT agrees, direction in the Plan Stds provides guidance for restoration

Issue: 11-3 Timber Harvest & Level of Production

Letter: 1387 I personally feel that we should be increasing our sales and harvesting more timber in order to have a healthier forest

Letter: 1391 Also keep in mind that this forest has only grown in the last century, since this area was clear cut in the early 1900's Your are not protecting some old-growth forest here, you are protecting former and future timber leases

Letter: 1594 Too much consideration is being given all over the USA to making money - while its important - it gets out of balance when greed takes over

Letter: 1627 Alternative 2 allows for harvest that is significantly less than the annual growth of the forest, providing for an increase in the stocking of the forest The forest will remain healthy while providing products and other amenities for future generations and for wildlife

Letter: 1632 Ecosystem management must embrace the lower output levels of timber associated with natural forest so as to assure other resources are not degraded Harvest levels should not degrade soil and water conditions, even for short periods

Letter 1632 The FS must recognize that many of the management activities on the Forest have a high potential to cause significant resource degrade, especially to soil and water Highly impactive, soil disturbing activities need to be monitored for longer periods and the consequences of intensive soil disturbing activities need to be reevaluated The bulk of soil and water degrade is a result of even-aged harvests, fire lanes, roads, ORV and site prep. The EIS, p 45, acknowledges that "uneven-aged" systems will have the least impact on soil productivity and sedimentation", yet the plan continues to tolerate resource degrade through endorsement of "predominantly" even-aged systems, chosen to maximize timber outputs This direction must change Minimization of fire lanes and prompt restoration should be a goal

Letter. 1632 The NFs are not capable of significantly offsetting inadequate timber management on private land, private owners must bear responsibility for overall industry health

Letter: 1651 The ASQ of 101.6 MMBF under alt 4B is less than half the growth of NFT Over time this will produce National Forests that will fall to insects, disease or fire I believe alt 4B fails to address this problem.

Letter: 1733 101 6 MMBF out of a mean annual increment (MAI) of 208 MMBF more or less is too low for good overall forest health and vigor

Letter: 1733 The economic and social dislocation will probably increase with reduced cuts on US Forest Lands by the year 2000 mainly because the reduced allowable cut on the NF is being made up by INCREASED cuts on private non industrial forest lands and in most cases no provision is being made to assure that these lands have adequate stocking or are regenerated

Issue: 11-3 *Timber Harvest & Level of Production*

Response: Comment noted

Letter: 8 I personally think 62 9 million board feet is way too much
Letter: 413 there won't be much left of our forests due to excessive timber cutting Please consider revising the timber cutting regulations
Letter: 539 It's time to stop overcutting in our NFs
Letter: 556 Only mandate change will stop the overcutting which is obviously economically beneficial to the local communities Forests are too valuable to be used for plywood and 2x4's
Letter: 651 over harvest of trees should not be allowed
Letter: 703 Why is it that anyone needs to be told that removing forests faster than they can grow is injurious?
Letter: 851 Logging companies need to better explore using tree farms for timber supply rather than destroying our last remaining virgin timber
Letter: 1143 We should reduce the amount of timber cut and sold and important to utilize all the timber cut including the salvage
Letter: 1351 The FS has not demonstrated a real concern for our fast disappearing national forests It is a real worry of mine and many that we are losing what can't be replaced.
Letter: 1393 I consider the level of logging proposed by the (alt 4B) to be excessive
Letter: 1435 I think the proposed ASQ of 101 6 MMBF is too much This is not sustainable for 10 years unless the forest is managed in a high intensity growth rather than reasonably balanced multiple use, especially if the forest is to move toward more longleaf pine and better streamside management
Letter: 1453 ASQ at the 101 6 MMBF is not sustainable for the Texas NF
Letter: 1568 Insist that logging be no more that 62 9 million board feet,
Letter: 1633 It is difficult to determine from the documentation provided what is a sustainable harvest level for the NF of Texas
Letter: 1636 It appears to me that setting an ASQ independent of SPB salvage sales can lead to overcuts Can a method be devised to set a total budget number using a ten year rolling average for SPB salvage for budget purposes or etc?
Letter: 1636 I favor your erring on the conservative side on setting ASQ
Letter: 1669 The forests belong to everyone, & your habit of "selling it off" should be stopped
Letter: *1670* *the FS could concentrate on managing for a healthy forest "ecosystem" for many purposes and not to just "to get the ASQ"*
Letter: 1670 As a member of the Sierra Club, I am not against timber harvesting on public lands What is objectionable is that lumber and pulp supplies seem to be THE priority However, as a stockholder of a company that owns commercial timberland and as an owner of private timberland, I wish the government would get out of the timber business
Letter: 1674 I am supporting a reduction in timber harvesting in the Texas NF System
Letter: 1679 Allowable sale quality is a political quota, not a measure of the amount of timber to cut The amount of timber available should be based on the amount of timber that has become mature plus the amount of thinned or salvaged timber
Letter: 1723 (pg 259 DEIS) in order to meet this you do not have to have a high level of output You could have low level and be sustainable This is a biased definition to promote timber cutting I object!
Letter: 1801 The annual level of logging in the preferred alt - 101 6 MMF - is excessive and will damage the forests Logging should be reduced to more sustainable levels
Letter: *1805* *The harvest of timber must be truly sustainable over the long term not just the short term*

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter: 1632 I consider the constraints imposed by non-declining yield commitments to be a limiting factor in dealing with resource degrade linked to past harvest levels I endorse the harvest levels (ASQ) and methods (uneven-aged) associated with Alt 6 I must point out that ASQ under alt #6 would reflect approximately a 1% deviation from regional historic "supply mix" outputs (Appendix B pg 44) Considering the natural fluctuations associated with annual harvests, this deviation is statistically insignificant

Issue. 11-3 Timber Harvest & Level of Production

Response: The FS will use ecosystem management as the means to meet goals specified in the revised FP Ecosystem management is the means to an end It is not the end itself The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Letter: 1310 The ASQ needs to be a maximum and it needs to include all timber harvest, including unprogrammed harvests, such as salvage

Letter: 1622 While SPB outbreaks tend to be cyclical, recent infestations have impacted significant areas of the National Forests in East Texas To the degree that salvage harvests have increased proportionately, the proposed annual allowable sale quantity of 101 6 MMBF should be reduced to about 70MMBF

Response: Per CFR 219 3, the ASQ is defined as "the quantity of timber that may be sold from the area of suitable land covered by the forest plan for a time period specified by the plan " " Within the planning period, the volume of timber to be sold in any one year may exceed the average annual ASQ so long as the total amount sold for the planning period does not exceed the ASQ Nothing in this paragraph prohibits salvage or sanitation harvesting of timber stands which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent danger of insect or disease attack and where such harvests are consistent with silvicultural and environmental standards Such timber may either substitute for timber that would otherwise be sold under the plan or, if not feasible, be sold over and above the planned volume " (CFR 219,27 (c) (2),). However, the NFGT has historically substituted salvage timber for green timber The ASQ identified in the FP was calculated on Lands Suitable for Timber Production only and therefore does not include any volume removed from lands such as special areas and SMZ's

Letter: 1678 The management of our Texas NF should not emphasize the production of wood fiber This is already done to an excess by the private sector These forests should be managed to the end that they will provide the maximum benefit to the people of this country, both now and for generations to come, benefits which are measurable in more than dollars or tons of wood fiber produced

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 1409 Timber harvest is an important segment of the local economy and care must be taken to maintain the balance In setting a limit on BFC I realize that amount may never be cut But the figure needs to be high enough that you would never be in a situation where you would have to stop cutting if there was a need Circumstances in this area are so unknown you can never predict your need, 100 BF seems to be a good limit that you have been working with, but only averaging 80 BF It needs to be a balanced amount for the forest

Letter: 1677 We support you in your efforts to improve the marketable timber in Shelby and surrounding counties

Response: The IDT appreciates your support

Letter 1463 for reducing the emphasis on using the NF in Texas for producing timber alone, without regard to the effects that even-aged mgt and excessive sales have on wildlife

Response: The FS manages for viable populations of wildlife that occur naturally on NFGT The environmental impacts on wildlife of the different alternatives are analyzed in the EIS

Letter. 1603 The Final EIS should contain a detailed discussion and comparison of harvest, growth, and inventory for each alternative We are confident growth will exceed inventory Illustrating this ..to the public and allay any possible concerns that there is no overcutting occurring

Response: See Appendix B, FORPLAN analysis constraints The constraints for LTSY and non declining yield ensured that the total forest inventory volume left at the end of the planning horizon (150 years) is sufficient to maintain the harvest pattern Harvested volume does not exceed growth

Issue· 11-3 Timber Harvest & Level of Production

Letter: 1439 Because growth exceeds the proposed allowable sale quantity by approximately 106 MMBF per year, there is sufficient room to adjust this figure upward
Letter· 1619 Allowable timber harvest should be increased

Response: Agree Biologically possible, but with the shift to uneven mgmt & budget constraints that amount of 112 cannot be reached

Letter. 1310 The FS needs to warn local populations not to expect the NF to compensate for the excesses of the large timber companies People need to know that these large timber companies are cutting their forests at a rate far faster than regrowth don't let them then buy off congressmen and senators to allow them to cut down the NF too when they have unwisely used up their own forests at an unsustainable rate

Response: The NFT are ultimately governed by the people of the US At this time, how timber companies operate does not affect how the NFT's conduct operations

Letter: 1394 I also object to the reduction in logging activity that would occur in the outer years of the Draft Plan That reduction in activity would adversely impact the local school districts and generally lower the standard of living in Angelina and surrounding counties

Response: The NF will be providing timber to millions on a non declining basis Therefore, what is provided in 1st period will be provided in last period Note this could be shifted between NF's within the state

Letter: 1510 Allowable sale is too small (in alt 4B) to maintain a healthy forest Growth cannot exceed removals at this rate without greatly increasing the risk of SPB and other hazards

Response: Agreed that rotations will be longer & timber will be more susceptible to SPB

Letter: 1603 the management intensity choice as simply the choice between rotation ages as opposed to a range of silvicultural options such as planting, precommercial thinning, fertilization, etc high intensity 40 yrs rotation, 140 yr rotation as low intensity The FORPLAN should be modified to consider a wider array of silvicultural prescriptions RCW foraging and nesting habitat could be created more quickly under an intensive timber management regime Shelterwood prescriptions, should be able to meet non-timber objectives at a lower cost than the all-aged prescriptions

Response: Runs have been made using different rotations However, the IDT realizes to drop below the present rotations would not be acceptable to the public, based on comments received both during scoping & during the comment period for the draft

Letter 1603 Under Alt 4b, within HMAs, at least 50% of the RCW acres must be managed under the all-aged prescriptions This produces an extremely binding impact on the ASQ and produces risks from a biological standpoint due to an untested and uncertain management scheme The Council does not believe that trying to maintain all-aged stands of Southern Pine on 50% of the forest is either possible or wise recommend that the Forest drop this requirement

Response: We agree this will be reduced to 40% in the final planned alt

Letter: 1603 calculate the ASQ under the 8 3% and 12 5% constraints and count salvage from any SPB, or other unplanned openings against the ASQ

Response: We released the constraint, and made FORPLAN run, it did not show any additional or appreciable volume therefore decided to apply the constraint, did not count salvage volume

Letter: 1603 no more than 8 3% of longleaf, shortleaf or slash acres, within an HMA may be within the 0-10 yr age class no more than 12 5% of the loblolly acres can be within the 0-10 yr age class The Texas forest calculated the ASQ using opening constraints more restrictive than those provided for in *the draft RCW guidelines in order to account for mortality, SPB, etc DEIS does not demonstrate estimates used to account for such unplanned* events have any historical validity

Response: The SPB openings were estimated on the average number & size for the past 5 years

Issue: 11-3 Timber Harvest & Level of Production

Letter: 1632 Allowable Sale Quantities and "hard targets" based on past timber-dominated management are unrealistically high

Response: We are not exceeding the long term sustain yield

Letter: 991 I do not believe the sale volume should drop below current levels. The 1992 forest survey of East Texas showed that all the commercial forests in Texas grew 710.2 million cubic feet and harvested 685 0 million cubic feet on an annual basis, or 96% The NFs by contrast grew 44 9 million cubic feet and removed 31 3 cubic feet or 70% The NFs can provide an important buffer to help stabilize the industry without adversely affecting the long-term sustainability of these forests. .. In recent years, there has been a major shift in the industry from the West to the South due to cutbacks in federal timber sales The targeted 101 6 million board feet annual harvest in Alternative 4B should be increased to a level comparable to Alternative 1, i.e , 112.0 million board feet.

Letter: 1612 . encourage the FS to consider increasing the ASQ if 101,5 MMBF as proposed in alt 4B The future health of our Texas National Forests cannot be maintained if the forests are producing twice the growth each year above the ASQ. The affects of the SPB on our Texas Wilderness Areas is an example of what will happen if harvesting continues to decline.

Response: For Alternative 8 (Preferred Alt) no budget constraint was applied. This resulted in an ASQ of 113 MMBF This is approximately equal to the current No Action Alternative (#1) of 112 MMBF.

Letter: 1608 The amount of timber production recommended in alt. 4B is higher than needed to sustain payments to counties and school districts A level of 63 mmbf (including salvage cuts from SPB and storm damage) per year at current prices would still return the same or greater monies because National Forest timber seems to be selling below the price for private landowners It is also interesting to note that in 1987 payments on a per acre basis were greater than the average current-use tax paid by private timberland owners.

Response: Timber sales are a "tool" used to protect, perpetuate, & improve our NF resources Trees are harvested for many reasons. to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, & fire; & for other reasons For example, timber sales are used to improve the habitat of the RCW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable & some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesireable mid-story vegetation, by installing artificial cavities in trees, etc. NFGT timber sales are advertised & sold by sealed bids to the gighest bidder. In FY 94, the NFGT received more than $15 million in revenue from timber sales, & just spent about $5 million on timber sales & all the other costs associated with timber sales. The net revenue to the US Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 of tax dollars spent during the FY

Issue: 11-4 Range Management/Grazing

Letter: 651 Overgrazing by cattle should not be allowed

Letter: 1723 you want to graze more cows and because the FS is not willing to face the heat from people who graze cattle to do the right thing .. This is not ecosystem management but the same old dominant use high energy intensive nonnatural management that has been going on for years.

Letter: 1723 (pg 69 DEIS) I want grazing reduced severely on the grasslands

Letter: 1723 (MA-3-51) . change this from "shall be permitted" to "may be permitted" If you require it then there is almost no way to stop it if a problem occurs

Letter: 1723 (MA-3-54) I am opposed to use of salt blocks as being an indication of too intensive grazing management.

Letter: 1723 (MA-3-67) just say no to vibratilling, fertilization and herbicides.

Letter: 1723 (MA-3-81) . I want native species to be used for erosion control and pasture restoration.

Letter: 1723 (MA-4-21) .I am against any allowance of livestock in riparian areas

Letter: 1723 (pg 66 DEIS) you cannot assume that proper grazing management will occur. .. grazing is allowed in river bottoms where cow manure pollutes water and makes it undesirable to hike

Letter: 1723 (pg 67 DEIS) you never specifically point out in this document where you will discourage winter grazing and how you will prohibit it

Letter: 1723 I am against the digging of any range ponds. The use of metal tanks can occur and will impact the environment much less.

Letter: 1723 There must be no grazing in the bottoms to protect these important habitats.

Issue: 11-4 Range Management/Grazing

Letter: 1811 He has previously commented on availability of allotments and furnishing materials for fence maintenance. Wants grazing to continue and have more units available.
Letter: 1813 Wants to promote grazing. Complimented the recent law enforcement effort and trash pickup.
Letter: 1824 Pretty well satisfied with the way the grasslands are managed. Has had problems with fences and hunters. Wants to continue the grazing program
Letter: 1827 He wants grazing to continue, feels it is a viable use of the grasslands
Letter: 1829 Wants to keep grazing permits. LBJ has been managed better in the last five years due to law enforcement Used to have lots of traffic and too many bad activities. He thinks grazing is beneficial to the land and the vegetation He thinks grazing helps the diversity of the plants and thus the animals on the land. He feels the income from grazing is good for the community
Letter: 1830 Wants to favor grazing and improved grazing opportunities. Has had some problems with hunters
Letter: 1831 Wants to be able to continue grazing.
Letter: 1832 Wants to keep grazing permits. Would like more grazing opportunities.
Letter: 1833 He feels that grazing is beneficial to the grasslands to remove excess growth and feels it helps control invading brush If grazing is eliminated, that brush will increase.

Response: Comment noted

Letter: 1808 We believe livestock grazing on the grasslands, as proposed, fails to account for species and habitat incompatible with continued pressure from domestic livestock. ..woodland and bottomland components on the Caddo and LBJ National Grasslands are not as suitable for grazing as native grasslands and improved pastures. Deemphasizing livestock grazing in these areas should be considered

Response: Grazing is determined for each allotment based on available forage, mngt emphasis, etc Bottomland hardwood acres are not calculated in the allowable use No documented damage to these bottomlands has been identified

Letter: 1723 (pg. 48 Plan) . .define "sustainable grazing opportunities". Why are local needs put above national needs for grazing

Response: Grazing without long-term damage to the resources Livestock and wildlife needs are balanced during the allotment planning phase.

Letter: 1723 (pg 68 DEIS) it is important to note that the Texas A&M study did not look at all situations. I have seen signs of nonpoint source pollution in floodplains via cattle manure being next to streams.

Response: At this time we have no evidence to prove your point, but are improving our monitoring standards

Letter: 1808 Grassland Grazing and Range Management, p 69. It is stated, "It is anticipated that most acreage on the Grasslands would be available for permittee grazing in every alt., with the exception of special management areas and developed recreation sites. Allotments with a recreational emphasis would not prohibit grazing, however, this emphasis could reduce some use (season of use or intensity of grazing) on the allotment on a site specific basis " We believe that livestock grazing in bottomland hardwood areas (approx. 3,800 acres) should be limited and evaluated in regard to compatibility with wildlife resources. Limited grazing may have no impact; however, exclusion areas should be developed, monitored, and utilized as a basis for future management decisions in bottomland hardwood areas.

Response: Keep in mind, grazing is deemphasized in most forest alternatives. However, on the Grasslands, grazing (along with range management), is a key component of maintaining a healthy ecosystem. Land allotments with a recreation emphasis would not always prohibit grazing, but could reduce use in terms of intensity and seasonal use. Other areas would, as you suggest, decrease grazing. Obviously, we don't wish any livestock to call the shooting range "home". Grazing will also have to be seasonally adjusted to allow for sensitive plant populations to develop.

Issue: 11-4 Range Management/Grazing

Letter: 700 We own 20 head of cattle and we know first hand how destructive cattle can be on land and water sources Either stop the grazing or demand that grazing fees be raised to compete with the private sector and that the land and water sources be restored to original state
Letter 1679 Range fees should be comparable to private land grazing fees

Response: Congress controls grazing fees

Letter: 1723 (MA-9a-101) I agree, remove livestock
Letter. 1723 (MA-9b-101) I agree that livestock must be eliminated

Response: The IDT appreciates your support

Letter. 193 Our national grasslands should be managed to be as natural as possible, by adding bison, pro[ng]horns, prairie dogs, etc and removing all domestic stock This would bring in more money from tourism and help these ecosystems
Letter: 1385 The possibility that bison could replace livestock on the National Grasslands seems not to have been considered The Grasslands, assuming stock are removed, could become important examples of prairie ecosystems

Response: Considered, but abandoned in the process because of this small broken ownership pattern This makes the Grasslands unsuited for bison which need large areas

Letter: 1814 Wants to continue grazing Very important to their income as retired people Doesn't want grazing fees to go up Wants to be able to supplemental feed hay in winter Concerned about damage caused by hunters, has had cattle shot in the past

Response Grazing fees are controlled by Congress Some risk exists in most resource management, but cattle loss is very low considering the number of humans using the NF

Letter. 1809 Wants grazing to continue, concerned about inconsiderate hunters that leave gates open, shoot cows and deer
Letter: 1810 Wants to promote grazing, forage utilization/management Concerned about recreationalists, hunters, vandals that leave gates open, shoot cattle, destroy property
Letter: 1812 Concerned about the amount of shooting of all kinds still going on Their land is adjacent to their grazing unit and have lot of trespassers Wants to see posted signs on fences Wants grazing to continue
Letter 1815 Wants grazing to continue Thinks FS should regulate who is hunting by registration permit to know who is on grasslands in case of damage or illegal activity
Letter. 1816 Wants grazing to continue OK with recreation but unhappy with vandals, destructive hunters, had one cow shot
Letter: 1817 Wants to continue grazing Concerned about hunters damaging lands and conflicts of hunting with grazing management
Letter: 1818 Promote grazing Thinks a fee should be charged for all recreation activities Very frustrated with gates left open, fences cut, trespassing on private land Wants to know what government will do about this
Letter: 1819 Promote grazing Wants more grazing opportunities Doesn't like problems with hunters, vandals
Letter: 1820 Generally OK with grassland management Pro grazing, land use Frustrated with gates left open and trash thrown out
Letter: 1821 Good to limit rifles and pistols to slow down vandalism OK with recreation but wants to stop vandalism
Letter: 1822 Main concern is about hunters hunting near his house, he lives adjacent to unit 41N Concerned about vandals and shooting Wants to continue grazing and other grazing opportunities
Letter: 1823 Wants to promote grazing and grazing opportunities Concerned about hunters leaving gates open, vandalism and indiscriminate shooting
Letter: 1825 Wants to promote the grazing program Concerned about damage caused by hunters and horsemen by cutting fences, vandalism etc
Letter: 1826 Wants grazing program to continue, grazing cattle is very important part of her income Has had problems with vandals, cattle being shot, trash left on grasslands
Letter: 1828 Pro grazing, wants to keep her permit Has had problems with gates and fences.
Letter: 1835 I like the grasslands being run the way they are and approve of restricting shooting to developed facilities for recreational target shooting Also approve of restricting hunting to shot gun & black powder (muzzle loading) for hunting Also believe the grasslands should remain closed to motorized off road vehicle use Don't believe recreation and livestock operations mix very well

Issue: 11-4 Range Management/Grazing

Response: Because we do not control road access, registration of hunters and control of all users as would be needed to determine who may have caused damage is impracticable

Letter: 1836 Was concerned that recreation use limits livestock grazing

Response: On the NF, livestock numbers are very low and do not interfere with recreation On the Grasslands however, higher numbers of livestock require more fencing and do require the hikers and horse back users to stop often to open and close gates Where budgets allow, we are installing recreation user-friendly gates.

Letter: 1723 (pg 72 DEIS) I do not want fair range conditions There is no reason why every acre of tall grass cannot be managed for good or excellent range conditions This means eliminating some grazing and restoring areas and making some areas off limits to grazing and converting back to tall grass prairie but you can do this I want the best Why should the public have to settle for less and more impacts on their lands?

Letter: 1723 (MA-3-58) fair is not good enough for range conditions I support good or better Remove cattle from pastures that cannot be brought up to good or better conditions

Response. Changes have been made between draft & final to reflect some of your concerns

Letter: 1723 (MA-3-56 and 57) I am against the use of fertilizing, spraying, vibratilling, and herbicide useage This is high intensive range management and does not coexist with ecosystem management

Response: The IDT disagrees, the USFS & NRCS have worked cooperatively on the Grasslands to develop sound techniques for restoration of native grasslands Prohibition of the stated techniques would make restoration techniques much more difficult

Letter: 1723 (MA-3-55) you do not need stock ponds built protect the natural water sources, the streams, and their riparian vegetation and keep cows out of these areas

Response: The emphasis on artificial ponds has been changed between draft & final

Letter: 1723 (MA-4-71) remove this Cattle are not compatible with riparian zone protection What does "consistent or compatible with adjacent management areas" mean?

Response: Grazing emphasis is on open grasslands which occur on the uplands Proper mgmt of the grasslands will ensure grazing use on grasslands & not riparian areas

Letter: 1723 MA-1-42 - how will you monitor cattle and wildlife competition for browse and herbaceous plants?

Response: See Plan App G, objective 4e

Issue: 11-5 Wildfire

Letter. 1605 Road building increases the chance of fire

Letter: 1723 (pg 56 DEIS) policy of suppressing all wildfires is part of the problem with the present forest In areas where fire periodically did play an important role this suppression has caused an altercation of the plant community

Letter: 1723 (pg 106, DEIS) the chance for catastrophic wildfire is very low

Issue: 11-5 Wildfire

Response: Comment noted

Letter: 1723 (pg. 105, DEIS) fire hazard in wilderness areas because fuels loads are up and SPBs have killed many pine trees .the increase in fire hazard usually lasts a few years because other vegetation grows up in disturbed areas and recreates the moisture and humidity regime Only in excessively dry time. is such fire hazard much greater than normal ..in 1993, Indian Mounds Wilderness Area had a fire in the heavily hit pine areas. Even though there were tons of fuel to ignite the fire was relatively small and did not burn real hot I believe your assessment of fire hazard is overly pessimistic

Response: Wildfire suppression usually prevents large fires developing from each ignition The fact that wildfires have been ignited from within the wildernesses does not mean that these areas would not have burned from natural ignition outside the wilderness boundaries The fire history of these areas also include native american burning, which has not been present in the last 100 + years.

Issue: 11-6 Wildlife sustainability

Letter: 1310 Most wildlife, especially wild turkey, will do better with fewer roads
Letter: 1310 Stop making pine monocultures and you'll get a better quality of deer. Studies conducted by SFA University have shown that deer in pine plantations are undernourished and therefore have a poor survival rate and bucks don't develop good racks.
Letter: 1640 Alt 6 is preferred because it has less impact on wildlife because less area is for recreation than in alt 4B

Response: Comment noted

Letter: 1239 I hope you are able to look into the future when you honor your responsibility to serve your country as a federal employee.
Letter: 1353 as our population increases . our natural resources will become more valuable, something our children will judge us by today Are they going to look back and thank us, or will they wonder how we could have been so shortsighted?

Response: Trees, like all living things, do not live forever When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again Trees planted in 1920 are now 60 years old; stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc. Regeneration ensures today's forests will be here tomorrow All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended

Letter: 1285 I must opt for ecosystem protection particularly in these significant aggregates of public land It is an approach and opportunity which may prevent a badly scarred land
Letter: 1457 We need to protect our resources and environment. At our rate of exhaustion they may not be available for our children and grandchildren
Letter: 1669 When their habitat is gone, so are they You're supposed to PROTECT our Forests, wildlife & habitat, but all you want to do is sell to the highest bidder.

Issue: 11-6 Wildlife sustainability

Response: One of the purposes of the FS is to supply timber. NF are managed for renewable and non-renewable resources which include "...but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values .. without impairment of the productivity of the land ..."(FLPMA Section 103 (c)). National parks and monuments were created to preserve. There is no commodity production in a National Park. The NFGT are part of the FS, not the NPS.

Letter: 1136 . deterioration of the ecosystem over these years has been steady and relentless The decline in wildlife is very noticeable as well. My children see roughly half of what I use to see...

Response: Not all species require identical habitat conditions. The revised Plan provides for a variety of habitat conditions.

Letter: 1509 ... when our wildlife has no cover nor protection, it disappears forever and cannot be enjoyed by our children and grandchildren.

Response: The FS manages for viable populations of wildlife that occur naturally on NFGT. The environmental impacts on wildlife of the different alternatives are analyzed in the EIS.

Letter: 1808 Several listed candidate species (Rafinesque's big-eared bat, Plecotus rafinesquii, Southeastern myotis, Myotis austroriparius, and the LA pine snake, Pituophis melanoleucus ruthveni) and the USFS's secondary cavity nesting species, depend on snags and dead and down material to meet their habitat requirements. Recent ongoing research indicates that very few of these species inhabit National forests (and other Federal and State locations) in east Texas We recommend increasing the current number of snags (0 to approximately 6/acre and dead and down material/acre (unknown amt.) in these NFs by requiring protection of these forest components in the prescribed burning program.

Response: Changes have been made to reflect some of your suggested changes.

Letter: 395 Do not let greed and a "get it all now" mentality destroy our resources. Let's save some for our children and grandchildren.

Response: The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness; and determine for management systems, harvesting levels, and procedures." Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons... to maintain or improve the health of timber stands; to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat; to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons. For example, timber sales are used to improve the habitat of the RCW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc See app. B for constraints used that ensure renewable resources are available in perpetuity.

Issue: 11-7 General

Letter: 1310 For hunter and public safety, make all national forest lands Type II lands.
Letter: 1484 Our national forests (and our national parks) are the only places we can actually guarantee the further existence of forests as complex systems of flora and fauna.

Response: Comment noted.

Issue: 11-7 General

Letter: 1386 We must protect forest areas for future generations' enjoyment of life We must learn to conserve and RESIST PRESSURE FROM SHORT RANGE INTERESTS
Letter: 1403 There are too may pressure groups who want access to public lands for their own selfish interest. When our natural resources are gone, they will be gone forever and we all lose
Letter: 1595 you MUST PRESERVE as much of our natural forest in East Texas as possible for future & present generations, regardless of commercial pressures.

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 1808 App I, p 1-15 The "desired future condition" regarding snags and dead and down trees for each of the forest types listed in the Appendix, includes a statement the "The high temperature and humidity in east Texas and the recurrent fires prevent large build-ups of snags or down material over large areas " The lack of snags and dead and down material in the NFs in Texas is primarily the result of prescribed burning programs which have not included provisions to protect this important forest component

Response: Controlled burning probably creates as many snags as it destroys when done properly

Letter: 1605 The DEIS fails to discuss adequately (if at all) what measures the FS may have taken or may plan in compliance with the legal requirement to protect soil, watershed, wildlife, fisheries, aesthetics, and forest productivity NFMA Sec 1604(g)(3)(F)(v) The DEIS fails to reflect any details of monitoring of all the even-aged cuts that the FS has made the FS has failed to comply with Section (F)(v) in many ways Furthermore, the DEIS and Draft Plan call for further even-aged practices which would degrade the statutorily listed resources, and each of them

Response: The EPA has reviewed the DEIS & found the analysis adequate. Chapter III of FEIS goes into greater detail on the effects of the alts on the biological, physical, & social elements of the human environment

Issue: 12 MIX OF GOODS AND SERVICES

Letter: 1632 I assert that due to the constraints imposed by 36 CFR 219 27, this plan is inherently unable to adequately address the issues and concerns, namely, biodiversity, vegetation manipulation, special management areas, wildlife and fisheries, resource sustainability and mix of goods and services
Letter. 1632 The Plan is fundamently flawed in that it fails to have the authority to adequately address resource degrade and imbalance expressed in the issues and concerns

Response: Comment noted

Issue: 12-1 Balance of Multiple-uses

Letter: 18 Forest management can be profitable and ecologically sound
Letter: 1221 I am in total opposition to the ATV and ORV vehicles in the NFs I am opposed to hunting in the NFs

Issue: 12-1 Balance of Multiple-uses

Letter: 1614 If official policy is to initiate professional management consistent with the published goals of sustainable ecosystems management then assume responsibility for balancing multiple uses of public forests INCLUDING TIMBER PRODUCTION with landscape-wide similiar ecosystem needs on private forest ownership The less economic benefits and the fewer tons of wood fiber harvested from national forests, the more intensive and uglier private forest management will inevitably become The premise of managing public lands to emphasize aesthetic values and down play economics is the ultimate NIMBY attitude

Letter: 1632 I endorse a significant shift in NF management away from the current levels of timber production to a level that better protects and promotes the other NF resources Whereas timber will continue to be produced from the NF, I wish to see timber-related training and budget reflect a greater degree of resource protection and monitoring, so that timber can be produced with less environmental degrade than has occurred in the past

Letter. 1654 This forest is an artificial forest planted as a timber resource It has become a source of recreation for thousands and a harbor for wildlife The trails do not negatively impact the environment In fact they create fly ways for many birds

Letter: 1674 It is important that we recognize the importance of these areas in maintaining a healthy population of native wildlife and suitable wilderness habitat

Response: Comment noted

Letter: 1680 Our forests serve as havens for biodiversity and as a natural control system for air quality To sacrifice this, as well as degrading sustainable recreational use, for the sake of a high yield, short term, economic return is inconsistent with thoughtful land stewardship

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter: 150 Please consider the fact that Texas is known world-wide for it's wild-west image, foreign tourist dollars are real, sustainable income

Response: The FS strives to maintain NFGT benefiting all mankind Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy

Letter· 399 Far too much emphasis is placed on high paying jobs that destroy the environment and make a select few rich

Response The EIS and Plan are not about jobs, but managing the land in an ecosystem manner

Letter: 1773 I was under the impression that the NF was for "public" use and recreation Your so called "important decision" (ORV ban) will ultimately force a lot of retired, elderly, or widowed people to move back to the dangerous hustle and bustle of the big cities

Response ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter: 1620 All of us have a right to use Public land for recreation I cannot believe the Forest Service blames ATV use for the problems your agency says the forests are encountering What about clear cutting?

Response: An ever increasing population, demanding more and more has generated more and more environmental laws and regulations to protect the resources from the increased use and environmental concerns Restrictions are implemented only to protect the resources and other users

Issue. 12-1 Balance of Multiple-uses

Letter: 149 I am continually dismayed at the shortage of places for people to go and the timber priority the FS has, as opposed to recreational. It was supposed to be "our", the people's forest, not a corporate forest.
Letter: 346 Multiple use management has for too long favored logging, which effectively ruins other uses for both people and wildlife. While USFWS is working to protect neotropical migrant habitat - the NFS is rapidly destroying it through poor lumber (timber) management
Letter: 368 Too much emphasis is placed on commodity production
Letter. 388 In the Draft management plan too much emphasis is placed on commodity production (much of which will be exported.)
Letter: 1223 Please do your best to maneuver among those quick-cash selfish exploiters who don't give a flip about our children's world.
Letter: 1255 Our bounden duty is to protect them, not to allow one tree to be cut.
Letter: 1265 Our public lands will be the only areas remaining that are wild or where we can protect biodiversity.

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include "...but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values .. without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve. There is no commodity production in a National Park. The NRGT are part of the FS, not the NPS.

Letter: 233 .it stresses the production of forest products at the expense of protecting the environment's streams, soil, wildlife, old-growth timber, and biodiversity

Response: You make some valid points, but remember, timber is sold only when a decision has been made to remove timber for the benefit of the ecosystem. In changing the tax situation, this is an item Congress would have to legislate

Letter: 1767 The only benefits from USFS to the county seems to be timber production at this time. Please do not take this away by adopting a policy of protection instead of production What needs protecting is our wildlife not our timber. Increase both law enforcement budget, timber production, continue to fight SPB and do as many controlled burns as possible I believe these issues are of utmost importance to the citizens, tax payers, landowners, and school students who reap the benefit of timber harvests

Response. The IDT appreciates your support

Letter 992 Please "Hang Tough" and retain the "timber-first" emphasis for our east Texas forests.
Letter: 1679 This Draft RP is commodity oriented It gives only lip service to the other multiple uses.

Response: Harvesting trees is a forest management tool that can achieve multiple objectives, particularly in providing various types of wildlife habitat. The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness; and determine for management systems, harvesting levels, and procedures." Not providing for some level of sustained timber harvesting would put us in violation of the law

Letter: 216 I understand the NF were established with the multiple use concept in mind. With this includes the harvesting of timber. I . . feel it is good for the surrounding economies
Letter: 585 Non-consumptive use of public lands must be given priority
Letter: 1243 Let's put the multiple-use back into our forests.
Letter: 1313 Let's stop this emphasis on commodity production (oil, gas, timber, grazing) and begin managing these national forests and grassland as instructed by law- multiple use management Perhaps you have forgotten but there are valuable resources on these lands, like wildlife and old growth

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values...without impairment of the productivity of the land..." in accordance with FLPMA Section 103 (c).

Issue: 12-1 Balance of Multiple-uses

Letter: 503 Multi-use cannot be looked at in a vacuum only within the borders of a NF. The NF must be used to fill the gaps in the regional landuse, i.e. if there were not so much private land used for maximum timber production then the role of the NF in East Texas should consider timber production as being one of the more important functions. However, since there is intense timber production on private lands, and little consideration given toward biological diversity, I feel that it is imperative that this new management plan stress these regional deficient uses rather than timber production.

Letter: 854 Our NFs were set aside for MULTIPLE uses, but this draft plan seems to be written for maximum use of our forests as a commodity.

Letter: 862 I believe we have too long placed more emphasis on timber and mineral production on our NFs than on conservation of those ecosystems. Once these are destroyed they cannot be replaced.

Letter: 983 I feel that too much has been devoted to resource production ....and not enough to recreation and wildlife preservation.

Letter: 1254 The proposed management plan places too much emphasis on harvesting timber as a resource, and not enough on managing this public land for multiple use.

Letter: 1392 A recent survey showed the majority of TX voters want mixed use of our forests We're tired of the TX and National Forest Services justifying their jobs by catering only to the forest companies' benefit.

Letter: 1400 It is important to remember that our national forests are not farms. They are meant to be enjoyed by everyone not just used for profit by a few.

Letter: 1434 The original purpose of the National Forests was to provide habitat for wildlife, protection of the land, and recreation as well as economic uses. As you know, the emphasis has been on the latter. It doesn't bother me if lower timber yields from the National Forests makes the price of lumber go up.

Letter: 1465 Our national forests belong to the people. Not to the timber and mineral companies.

Letter: 1510 The forest was placed here for man's use. It is only worth having if it can be a BENEFIT for the good of mankind.

Letter: 1617 There is too much emphasis on commodity production now. Start thinking about ecosystem protection and diversity instead of even-aged management.

Letter: 1625 I feel that the high commodity production must be SIGNIFICANTLY lowered, both timber and mineral...

Letter: 1632 ...Forest Service management lean in favor of timber production to the detriment of other NF resources.

Response: The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness; and determine for management systems, harvesting levels, and procedures.'" Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources. Trees are harvested for many reasons ... to maintain or improve the health of timber stands; to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat; to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons For example, timber sales are used to improve the habitat of the RCW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc. See app. B for constraints used that ensure renewable resources are available in perpetuity.

Letter. 1765 This State's NF resources may not be raped for the special interests of timber companies, local school districts and county coffers. In any case the latters interests are best served by sustained yield of ASQ and current private forest logging prices being charged for all the logging and other resources removed from this State's NF, the property of ALL the people.

Response: Timber is managed using the ITSY principle as detailed in EIS App B. Timber is sold by sealed bid. NFT timber sales are advertised and sold by sealed bids to the highest bidder The NFT do not "undercut" the prices private landowners receive for timber. The timber on NFT historically sells for higher prices than other timber sold in the state The "TX Timber Price Trends" publication shows the NFT have historically received more for timber than private & corporate landowners There are many, many factors that determine the value of timber, but regardless of the factors, the prices paid for timber on the NFT are the highest statewide & are historically among the highest prices paid for NF timber in the South. Most of the timber sold on the NFT is purchased by small businesses, not large corporations. Historically, small businesses, such as sawmills & independent loggers, have successfully bid for & purchased about 60% of the timber sold

Letter: 1603 Alt 4b requires 44% of the acres outside the HMA (MA-1) to be managed under the all-aged prescription .. to provide for non timber outputs according to the draft EIS (page III-23) .Alt 2 ..vs Alt 4b shows .. Alt 2 has just about the same recreation and wildlife outputs as alt 4B...4B has just 1.5% more Recreation RVD's, 0 7% more Big Game WFUDs, -4.4% more Small Game WFUDs; and 0 5% more Gray Squirrel acres. Are these the increased benefits of assigning 44% of the MA1 acres to all-aged management? In terms of ASQ, these prescriptions are only about half as productive as the even-aged prescriptions. Lifting this constraint would increase the ASQ by 23 MMBF per year, a 22% increase.

Issue: 12-1 Balance of Multiple-uses

Response. The constraint on even-aged mgmt was reduced in Alt 8 This gave an increase of 12% from Alt 4B, the preferred in the Draft Plan

Issue. 12-1-1 Commidity use

Letter: 1679 Commodity extraction, including grazing and mineral extraction should not take precedence over recreation Recreation should not take precedence of biological values

Response: Comment noted

Letter 1723 (pg 192-193, DEIS) you have nature study making 15% gains but on page 193, you show a -1%

Response The sentence on pg 192 states "Lifetime activities such as " The paragraph on pg 193 shows projected gains/losses by individual activity

Issue: 12-1-2 No commodity use

Letter: 1668 I think it is important to have a long term, sustainable plan developed where the production of timber and cattle is done entirely on private land, not public land

Response· Comment noted, though this is really a congressional-interest item

Issue: 12-2 Implementation of the Forest Plan

Letter: 1612 Alt 4B should provide the public with a better understanding of management priorities based on expected funding Alt 4B cannot be achieved based on historical levels of funding

Letter: 1723 (pg 27 Summary) you talk about what the impacts of alternatives will be on wildlife Yet we do not have a model today that can accurately predict what will occur in 50 years much less 10 years We are kidding ourselves to believe that these comparisons mean anything They are useless because the money is not even available to implement the plans

Letter 1723 There are no promises of additional law enforcement personnel and yet this is what is needed if such indiscriminant shooting is to be stopped

Response: Comment noted

Letter: 1310 Campgrounds should be self supporting Wildlife doesn't need a budget, it just needs to be given a good habitat, which nature will provide for free, and protection from poachers Range doesn't need a budget, grazing should be self-supporting or stop the grazing and save the taxpayers' money The timber budget could probably be substantially reduced too, especially if unnecessary roads are not built

Issue: 12-2 Implementation of the Forest Plan

Response· Comment noted, though this is really a congressional-interest item

Letter: 1310 With a $16,000,000 backlog in needed rehabilitation work needed on current campgrounds and recreation sites, it is unrealistic, illusory, and irresponsible to forge ahead with plans for building more campgrounds' Where is the money going to come from?

Response: We are presently in the process of doing rehabilitation work on several areas Costs of replacing old worn out facilities has gotten extremely costly and funding has been scarce

Letter: 1679 The Draft FP is general, not specific Project decisions do not tie back to the EIS thus neither addresses actual environmental impacts What is your planned timber sale program Which areas are you going to cut, and when will they be cut The amount of timber alone is not really a plan, it is just a goal

Response: The revised Plan is a guide to implement the selected alternative The EIS evaluates the environmental effects of the alternatives The choice of a harvest method is based on a site-specific analysis and documented in the project-level environmental documents

Letter: 1723 (pg 230 plan) you need to determine what you consider priority for funding with a realistic budget You budget as if you have unlimited money when this does not occur What would a realistic budget look like in funding all the things you want to do?

Response. We agree, however, budget cannot be used as a constraint

Letter: 1723 (pg 226 plan) the 3 yr implementation plan is too long Two yrs should be the maximum wait period and there needs to be some mechanism to keep from making crucial decisions that will materially effect the resources before the new plan is implemented

Response: Three years is the generally accepted time frame If you have a specific concern that needs a shorter time frame we will be glad to discuss it with you

Letter: 1472 Ecosystem management as described in the DEIS is, in many respects, very labor intensive There will be increased needs for various types of expertise and for a labor force to implememt the management strategies It does not appear that funding levels will be sufficient to permit the USFS to do all that will be needed to implement alt 4B

Letter: 1603 The budgets for each of the alternatives are higher than the current budget . The DEIS does not, show what the public could expect given current budget levels Senate Resolution 285 addresses this issue specifically. develop a schedule of management over time based on expected appropriations and the ability to achieve a biological objective over the period of time A phased in approach would also be better able to respond to the social and economic impacts As the schedule is implemented over time, the public will be able to adjust and respond to changing societal demands Any other approach would simply not be realistic, would cause significant impacts without achieving the desired objective, and would be costly

Response· Funding is always a consideration during plan implementation Budgets are estimated based on a "perfect case" scenerio, we acknowledge that actual budget & work output will be less We have made this concern clear in all discussions with the public

Letter 1723 (pg 228 Plan) since you have no wetland inventory how will the District be able to determine where wetlands are? You need for all four national forests and the grasslands a complete wetlands inventory done for riparian areas, 100 year floodplains, etc This inventory needs to be done when it rains so you can see where water flows and wetlands are

Response: The ECS provides for methodology for such determinations See plan appendix A for details

Issue: 12-3 General

Issue: 12-3 General

Letter: 1627 Alternative 2 offers a net gain of jobs and the highest gain in income. Those increases provide economic stability and moderate growth to East Texas.

Response: We agree that Alternative 2 offers a net gain of jobs and the highest gain in income But, we have to manage the forest for a wide array of uses, values, products, and conditions The alternative preferred reflects the best mix with all considerations

Issue: 13 PLANNING/PLAN/EIS

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 48 DEIS) .I disagree that comments before and after the comment period for scoping did not raise any new significant issues. I feel that my comments did just that after the comment period But you disagreed Again a subjective decision but one that needed to be made and was.

Letter: 1723 (pg 3 DEIS). you say that the preferred alt "best addresses the 15 major issues" that is a subjective statement and depends on the point of view of the person

Letter: 1723 (pg 235,236 DEIS) . by allowing clearings to be considered forest land you run the risk of overestimating the timber around and what is available for wildlife

Letter: 1723 (pg 5 DEIS) you say that the "Forest-wide standards and guidelines provide significant protection measures" for ORV use and its impacts on the environment. This is not true. . open riding areas will still be allowed . you still allow riding on trails when it has rained .. I want no riding in rainy weather and until soils dry out after rains. . Protection of forest resources must come first before any play is allowed.

Letter: 1723 (Pg 22 Summary) you talk about how Alt. 6 prohibits ORV use. on page 14 you say nothing about this. You are very confusing in clearly saying what is and is not allowed in alternatives for ORV use.

Letter: 1723 (pg. 24, DEIS Summary) I am in violent opposition to any cutting in special interest areas.

Letter: 1723 (pg 9, LRMP) I oppose the use of any chemicals for uneven age management or other management

Response: Comment noted.

Letter. 1680 I believe that the FS should heed public sentiment by placing more emphasis on sustainable wilderness conservation, instead of commodity *production*

Response: In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Forest Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process, but rather the identified ability of the selected alternative to maximize net public benefits Besides public comments, other factors such as national and regional policy and the analysis of resource opportunities also play a role in reaching this decision.

Letter: 1679 The Draft FP does not have requirements that would eliminate money losing sales.

Response: NFGT timber sales are advertised and sold by sealed bids to the highest bidder. The NFGT do not have a "below cost" timber sale program. Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records. In FY 1994, the NFGT received more than $15 million in revenue from timber sales, and just spent about $5 million on timber sales and all the other costs associated with timber sales. The net revenue to the U S. Government from the timber sale program was about $10 million. The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY.

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1805 I want a Forest Plan that truly manages for the preservation of a natural native ecosystem.. My children and grandchildren have the right to inherit a true Forest in good condition

Response: Trees, like all living things, do not live forever When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again Trees planted in 1920 are now 60 years old; stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc Regeneration ensures today's forests will be here tomorrow. All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended

Letter: 1723 (pg 199 DEIS) uncontrolled and controlled ORV use has been proven to have adverse impacts to vegetation, soil and water values and not, as you say, "may"

Response: ORVs have been identified as a legitimate use of the NF It is definitely a recreational pursuit Our intention is to manage ORVs, to minimize resource damage

Letter: 1632 36 CFR 219 27 inhibits the ability of the FS to adopt less impactive timber mgt systems as is evidenced by the plan's failure to commit to a single acre of UAM. Predictably, EAM has been endorsed through qualifications (FW-164) sufficient to allow clearcutting of virtually every acre of forest outside of wilderness. The Plan is fundamentally flawed in that it fails to have the authority to adequately address resource degrade and inbalance expressed in the issues and concerns.

Response: Harvest methods are based on a site-specific analysis designed to meet the site's DFC. The environmental impacts are documented in accordance with NEPA Contract terms and conditions are used to implement the necessary S&G to prevent unacceptable damage.

Letter: 1723 (pg 7 summary) .how may acres will have uneven age management used on them. ?

Response: The revised Plan is a guide to implement the selected alternative. The EIS evaluates the environmental effects of the alternatives. The choice of a harvest method is based on a site-specific analysis and documented in the project-level environmental documents.

Letter: 1165 I oppose any plan which would further destroy wildlife habitat or reduce biodiversity

Response: The FS manages for viable populations of wildlife that occur naturally on NFGT. The environmental impacts on wildlife of the different alternatives are analyzed in the EIS

Letter: 1310 The DEIS is inadequate to support a Forest Plan It doesn't take a hard look at too many issues . It is biased against selection management and against wilderness, while it is biased in favor of even-aged management and road building

Response: A range of alternatives with varying amounts of wilderness and selection management acres were analyzed See Appendix B of the DEIS. As for issues, scoping and public involvement were done in late 1990, more than 4,400 comments representing many diverse viewpoints about Forest management were received and reviewed Fifteen issues, 53 sub-issues and about 500 unique comments were identified The 15 major issues are addressed in Chapter 2 of the FLRMP.

Letter: 1603 The Council requests that the Forest evaluate the benefit and cost of this descretionary decision and consider an alternative that manages the MA 1 acres on a younger rotation.

Response: In Alternative 2 we analyzed some shorter rotations Loblolly of 60 and short and longleaf at 70, which are both less than current no action alternatives Also, the National direction is for a reduction in the amount of timber volume to be prepared for sale

Letter: 1603 The Council also suggests that the Forest undertake an analysis planned costs to see if there is some way to achieve targets with less expense

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response The FORPLAN model was used to rollover outputs as constraints in the selected alternative In order to produce outputs with the most economical approach Site specific work will be conducted the most efficient way as determined by the District Ranger and staff, this is necessary with the cutback in most government budgets.

Letter: 1603 problems with the FORPLAN 1) the final harvest figure on about half of the yield tables is zero, 2) FORPLAN cannot accurately calculate inventory or growth, and 3) FORPLAN cannot automatically calculate the long term sustained yield (LTSYS) coefficients so the Forest used a special set of LTSYS coefficents which may be in error

Response: Problems were noted 1) This problem did occur on approximately one-third of the even-age management yield files This did not occur on the uneven-aged or thinning yield files No significant change in ASQ or schedule of implementation was noted in rerunning the preferred alternative due to the large percentage of acres being assigned to uneven-aged and thinning perscriptions These corrections were applied to the final alternative with a reduction of acres forced into uneven-aged management 2) This problem was identified during the analysis process The purpose of these values to be calculated within the FORPLAN model were to insure that the cut will not exceed the growth and that timber would be provided in perpetuity Therefore, constraints of LTSY and NOY were applied 3) This problem was also identified during the analysis process The FORPLAN model was only able to automatically calculate LTSY for age dependent yield tables Therefore, an alternative method had to be determined for the uneven-age and thinning RCW yield files Therefore, using the formula that was used within the model for age yield tables. Total of all volumes cut over the rotation of a regenerated stand by the number of years within the rotation The volumes for the uneven-aged were averaged for harvested volumes once uneven-aged conditions were achieved The following values were used

Longleaf with use of fire and herbicides	- 0 238 MCF/Acre
Longleaf without	- 0 157 MCF/Acre
Loblolly with use of fire and herbicides	- 0 287 MCF/Acre
Loblolly without	- 0 189 MCF/Acre
Shortleaf with use of fire and herbicides	- 0 264 MCF/Acre
Shortleaf without	0 174 MCF/Acre
For RCW thinning prescriptions	0 00 MCF/Acre

Letter: 1603 Texas forest plan used the same price trends it did in the 1987 plan There have been important policy and economic changes in the timber economy since then The 1993 RPA Assessment contains price trends that capture the impact of some of these changes incorporate these updated price trends

Response. Concern over land and resource capability and sustainability has contributed to the debate over centralized, top-down planning versus decentralized, forest-based, bottom-up planning Resource capability information developed at the local level was intended to provide the foundation for RPA planning, at the same time, national objectives are essential to strategic planning and setting longterm goals Binding targets set at the National level in past RPA Programs have resulted in a concentration on timber outputs, at the expense of considering other outputs and conditions National analyses are likely to overestimate productive potential, because site-specific resource interactions are necessarily lost in aggregating data We looked at those as guidance and flexible goals By maintaining the 1987 FLRMP's price trends, we were able to compare the results with the 1987 Benchmarks See Appendix B, Model Perimeters for discussion on price trends

Letter: 1603 Economic analysis and employment impact analysis continue to be weak tables showing job changes should be expanded to address the changes by economic sector the economic value of forestry jobs compared with other jobs, such as recreation to enlighten the decision maker and the public on the inter-dependency of manufactoring and service industries

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: Economic considerations enter NF planning primarily as concerns for the balance among resource values, about management efficiency, and impacts of NF management on cummunities RPA and NFMA clearly indicate that efficiency is an important consideration but not the principle criterion for management decisions The FS used computer models - FORPLAN and IMPLAN FORPLAN was used to analyze investments, current and future benefits and costs and compared by calculating the present net value of the investment FORPLAN is a useful tool for examining the efficiency of management alternatives, but has limitation because many uses and outputs of the NF that are not marketed And those values outlined through existing techniques for unmarketed uses and outputs might not have values that readily compare to market prices Furthermore, nonuse values of the forest (option, bequest, and existence values) can only be included as constraints on uses and outputs IMPLAN used the outputs from FORPLAN to identify the economic impact of management alternatives IMPLAN estimates the employment and income by industry sector for multicounty areas around each NF The FS has no ability to influence demand factors, which are important to stable industry production Abrupt changes in the FS can be disruptive The FS has defined its responsibility to communities as attempting to avoid causing radical or abrupt shifts in local social and economic patterns

Letter. 1603 The DEIS could be improved by adding historical outputs no action alt is used as a basis for comparing proposed plans to historic plans , the no-action alt , has been modified to reflect the current direction of the District Court It no longer represents the Forest previous forest plan decisions or accomplishments the final EIS should include an additional alternative incorporating the 1987 plan with the 1985 RCW guidelines

Response: In response to issues identified during the scoping process, 9 alternatives were developed and analyzed This was determined to be adequate

Letter: 1603 The DEIS is misleading with respect to rotation ages The actual rotation ages are quite a bit longer According FORPLAN solution loblolly in MA 1 will be harvested at ages 100-120, not the 70 yrs shortleaf is harvested at ages 100-120 not the 80 yrs

Letter 1603 The draft EIS may mislead some readers about future forest conditions Clearly, the forest will be much older than implied by the DEIS

Response: In the short term there will be stands carried beyond rotation age because of unequal age distribution and the limits on the amount that can be harvested each period Especially with the large percentage of acres being managed by prescription other than even-age

Alt 4B Age/Existing Loblolly Age/Harvest

70-11,253	110-41,584
80-19,207	120-19,290
90- 708	130- 694
100-22,610	140-12,662

Acres of Existing Longleaf at Harvest

110 - 164 Acres
120 - 135 Acres
130 - 5,332 Acres
150 - 53 Acres

Acres of Existing Shortleaf at Harvest

70 - 3,490	120 - 20,973
80 - 4,252	130 - 748
90 - 10,422	140 - 3,240
100 - 14,695	150 - 5,614
110 - 15,831	

Letter: 1603 The Forest may have over-constrained the timber harvest schedule because it did not analyze the actual harvest age the decision to require 44% of the MA 1 acres to all-ages management is unnecessary benefits from the all-aged prescriptions will be provided by the long even-aged rotations Had the planning analysis displayed actual rather than minimum rotations, the constraint would have been unnecessary

Response: This has been adjusted to 30% based on VQO classification other than modified plus 5%

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1603 The Council is concerned that by not looking at the actual rotations, the DEIS may be underestimating the forest health problem inherent to Alt 4b Over 60% of the loblolly managed under even-aged prescription, , will not be harvested until sometime after age 100 The Council believes that this is a prescription for diaster

Response: Some 74,230 acres of loblolly will be carried beyond age of 100 in Alternative 4B

Letter: 1603 recalculate the ASQ for every alt using this approach, to demonstrate the FORPLAN's economic assumptions are not overriding the forest's ability to produce sustainable timber outputs

Response: Analyst did this on the draft FP's selected Alternative 4b The resulting ASQ was the same This reflects that maximum timber and maximum PNV benchmark were approximately the same.

Letter: 1603 The DEIS rollover was only done on the benchmarks and not for the forest plan alternatives The Council has raised this issue of procedure in other forests all forests should be consistent with regard to normal procedures, (e g maximizing first decade harvest)

Response: Analyst did this on the draft FLRMP's selected Alternative (4B) The resulting ASQ was the same This reflects that max timber and max PNV benchmark were approximately the same

Letter: 1604 The DEIS fails to discuss adequately (if at all) what measures the Forest Service may have taken or may plan in compliance with the legal requirement to protect soil, watershed, wildlife, fisheries, aesthetics, and forest productivity NFMA Sec 1604 (g)(3)(F)(v)

Response: See Appendix B of the DEIS constraints and the Monitoring Summary Table, Appendix C of the Draft Plan

Letter: 1310 There is no explanation of the large difference in SMZ acreage between the 1987 Plan and the current Draft Plan
Letter: 1605 There is no explanation of the large difference in SMZ acreage between the 1987 Plan and the current Draft Plan

Response: The riparian and wetland acres, floodplain soil with a hardwood forest type, that were not previously included in the SMZ (#4) were moved to that MA *This was a movement of 12,972 acres from MA 1 and 3,240 acres from MA 2*

Letter: 1679 The Draft FP does not address the concept of producing a forest crop in perpetuity

Response: See Appendix B, FORPLAN analysis constraints The constraints for LTSY and non declining yield ensured that the total forest inventory volume left at the end of the planning horizon (150 years) is sufficient to maintain the harvest pattern Harvested volume does not exceed growth

Letter: 1679 The EIS does not offer scientific research or documentation to explain how you are able to cut so much timber without damaging watersheds, wildlife food sources, habitat, and sensitive species, fisheries, aesthetics, and forest productivity
Letter: 1679 This Draft FP obviously came out of the FORPLAN program What data was fed into the program You did not document that you did the inventories required by NFMA How do we know that the data is correct How do you know that the data is correct?
Letter: 1679 There is no analysis of aggregate effects of management alternatives
Letter: 1679 The Draft FP does not adequately address the current costs and future benefits

Response: See Appendix B for analysis

Letter: 1679 The Draft FP cost/benefit analysis is warped The FS assumes increased water yields are a benefit The DFP does not insure that trees will not be cut until mature Too often pine trees have been cut early to meet ASQ

Response: Used values per RPA which showed that increased water yields have value See previous table for ages of harvested timber

Letter: 1723 (pg 178 DEIS) I believe that the FS does not manage a significant portion of East Texas forests The FS manages 5% of the total forest

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: Though the NFGT comprises a relatively small part of the East Texas timber market, the quality of NFGT market product (primarily saw timber) accounts for a substantial 20-25% of the total Texas sawtimber products

Letter: 1767 Alt 1 designates 52% to timber production while alt 2 and alt 3 each designate 40% but increases payment to counties I do not understand how this is accomplished but payments to counties should be increased if possible A further clarification of your method/plan to achieve the increased dollar volume while decreasing the acreage in timber production in your alt methods alt 2 is appreciated

Response: The difference is based on the direction on acres needed to support RCW 1200-meter circles are HMA concept and the different amount of acres in uneven-age management

Letter: 1605 maps for roadless areas are often imprecise and hard to read For special areas there are no maps or descriptions . except some unnamed dot clusters on some maps in the "Map Package " There is only one full list of special areas fails to show which area will be botanical, scenic, or ecological, or how many acres it might contain Inadequacies in the maps of roadless areas include failure to indicate clear boundaries of the Stark Tract and the proposed 410-acre addition to Winters Bayou, and continuing to indicate in white (private) the areas that the FS has acquired such as Upland Island . and Indian Mounds

Letter: 1723 Another problem is the maps These are very small and confusing You do not have each potential special management area shown in detail so a person can visualize what the area looks like Dots on maps do not tell me what the sensitive areas are, how large they are, and what they represent You can do better than this and need to

Letter: 1838 We found the affected environment to be well described However, the scale of the maps provided with the DEIS to define the management areas and each of the proposed alternatives made it difficult to interpret many of the features within the project area and the proposed improvements We suggest that either the scale of the maps in the FEIS be adjusted to facilitate the identification of natural and proposed features within the project area, or the current maps be further refined and additional relevant features be labeled

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter: 1436

You are making changes to your old plan and to historical usages of the forest. That is fine and there are good reasons to do so NOWHERE in any of the documents is there an indication of plans for implementing these changes A TRANSITIONAL OR IMPLEMENTING statement or plan should be a part of this document

Response·

After the RF selects a preferred alternative, a ROD will be prepared The ROD details the reason for the selection of an alternative and will also document any necessary transitional periods and strategies for implementating the revised FP

Letter· 1460 The map supplement for alt 4B shows that--despite increased overall acreage for RCW mgt compared to alt 1 (present condition)--the draft plan ELIMINATES many RCW colonies from active mgt in the Angelina, Davy Crockett and Sabine NF's! No presently known colony, active or inactive, should be excluded or considered expendable

Response: All active RCW colonies except for those in designated wilderness are in an HMA, which is designated as MA-2 in the revised FP MA-2 incorporates the RCW EIS

Letter: 1632 The plan acknowledges that timber mgt has a disproportionately large effect on overall resource outputs The implementation regs (36 CFR 219 27) related to NFMA (Appendix B, pg 58,) apparently mandates that EAM be used on NF lands I assert that due to the constraints imposed by 36 CFR 219 27, this plan is inherently unable to adequately address the issues and concerns, namely· biodiversity, vegetation manipulation, special management areas, wildlife and fisheries, resource sustainability and mix of goods and services My NF experiences have exposed instances where past EAM has failed to adequately protect and sustain soil and water quality, biodiversity, old growth, wildlife and fisheries, and natural integrity of Special Management Areas

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: 36 CFR 219 27 spells out some management requirements when even-aged management is used The choice of a silvicultural system and its associated harvest method is based on a site-specific analysis and documented on NEPA requirements Standards and Guidelines are in effect to mitigate negative impacts Most problems occur when the S & G's are not implemented

Letter· 1632 Notably lacking in the plan is methodology for less impactive, incremental restoration on a per stand basis small group selection Additionally, the plan fails to clearly quantify actual targets for even and uneven-aged acreage

Response· No silvicultural system nor one of its related harvest methods is prohibited in the revised FP Harvest methods are based on a site-specific analysis and designed to meet the site's DFC The environmental impacts are documented in a site specific EA which is available for public review

Letter. 1723 *(pg 234 DEIS) CEQ has regulations and not guidelines CEQ used to have guidelines but modified and changed these in approximately 1979 into actual* regulations So these are not discretionary but are mandatory for agencies to follow

Letter: 1723 (pg 33 DEIS) you say Alt 6 will not allow any ORV use in the forests But on page 26 you say "ORV use is limited to the current existing system of designated trails" Then on page 34 you say that there are 40 miles of ORV trails when in reality for Alt 6 the present PMT's are 55 miles in length on SHNF Then on page 36 you say there are zero miles of trails for Alt 6 You are confused yourself

Response: Thank you for bringing this to our attention The final EIS has been changed to reflect better consistency

Letter: 1723 (pg 6, DEIS) it is never explained what the "potential for overuse" is and how this will be monitored and what will occur if such overuse is discovered

Response·
This discussion is found in detail in the 1992 AMS

Letter: 1723 (pg 49, DEIS) there is an overall conflict between hunting and all other forest uses I request that the FS have certain areas designated during hunting season as being off limits to hunting to provide safe havens for other forest uses

Response: A descision to limit hunting or to restrict hunting areas is an administrative decision, not a FP decision

Letter: 1723 (pg 111 DEIS) I want an alternative that has all candidates for RNA designated so that the impacts of this alternative and the benefits are fully laid out on the table

Response· *All areas recommended for RNA status by the review committee have been assigned to MA-8a, Research Natural Areas, in this revision*

Letter 1723 (pg 198-199 DEIS) environmentalists never asked that all trails for ORV use, including the PMT's be closed down so why do you propose this in Alt 6

Response: Elimination of ORV use from the NFGT was proposed by some respondants This alternative was developed in response to this issue

Letter: 1723 your personnel have solicited on 11-30-94 ORV users to write in and ask that Boykin Springs not be shutdown from ORV use when the ROD is made and signed the FS is encouraging the longer use of a sensitive area by ORV's which are destroying part of the sensitive area

Response: We disagree with your accusation Everyone with an interest in the management of the NFGT is encouraged to write

Letter: 1723 this document has only one set of S & Gs to look at, the preferred alternative 4b There are no other S & Gs for implementing very different alternatives (7 others) This makes it impossible for the public to compare what the impacts will be with different S & Gs I believe this is contrary to NEPA and CEQ regulations which require a hard look at the impacts and requires comparisons that are clear between alternatives

Issue 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: Nine alternatives were formulated in order to provide the "broad range" requested by the public and the Chief of the FS But publishing and distributing a plan-version of each would be too costly We are not required to choose and publish a preferred alternative in the draft documents However, with the ongoing and successful involvement of the public in the formulation of the alternatives, we felt the time was right to begin to choose a direction and yet remain open to public and agency comment

Letter: 1723 (pg 48 DEIS) I disagree that Alt 4b is the best for small game Natural disturbance will occur in Alt 6 & 7 and will allow small game to make it In addition the old growth conditions will provide more habitat for gray squirrels and deer will be kept within their carrying capacity Also, swamp rabbits will do well in Alt 6 & 7 the disturbance and early successional habitat on adjacent private lands is ignored In no place in this DEIS and LRMP are cumulative impacts on and off forest looked at

Response· Overall benefits to small game show a better response in alts 1-5 than in alts 6&7 More species were evaluated than what you refer to

Letter: 1605 The EA has not discussed how the cumulative effects of harvesting timber in roadless areas will affect recreational use in wilderness areas constituting a violation of 40 CFR 1502 16, 1508 7

Letter: 1723 (pg 16 DEIS) Also, the cumulative impacts of SPB logging plus every other form of logging are not given (for alt 1)

Letter: 1838 Limited discussions on cumulative impacts for some resources are scattered throughout the document A summary of all cumulative impacts listed by affected resources could be presented separately for the benefit of readers

Response: It is important to understand that there are two levels of decision making in the FS The FP represents only the first level of decision making about the management of the NFGT Site-specific, project planning to implement the goals and objectives of the FP is the second level of decision making "Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions " (40 CFR 1508 7) Cumulative impacts are among the effects (40 CFR 1508 8) that must be included in considering the environmental consequences of actions (40CFR 1502 16) The "action" represented by a FP is the selection of a programmatic framework to guide future decision making on the forest, using FP management direction as a gateway to compliance with environmental laws at the project and activity level A FP is not an aggregation of 10 to 15 years of individual project decisions The EIS for a FP is, therefore, programmatic in nature Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources " In most cases, this commitment takes place at the specific project/activity decision point Therefore, the EIS for a FP commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the cumulative effects of individual projects/activities that have not yet been scheduled

Letter: 1310 The DEIS classifies the wilderness areas as primitive ROS, but this does not meet the definition as given in the glossary, since there is no place in any wilderness three miles from a road (and I don't mean closed roads within the wilderness) As the AMS of 1992 suggests, this should be recognized and acreage available for primitive recreation should be listed honestly as zero

Response: Definition under physical location identifies primitive as 3 or more miles from a road The social and managerial definition of primitive identifies the number of contacts with others and the managerial identifies how we would manage an area as primitive Wilderness is assigned the primitive ROS primarily because of the Social and Managerial elements

Letter: 1310 Why doesn't the DEIS use a standard definition of ROS categories? It seems reasonable to me that primitive or semi-primitive non-motorized should mean the same in Texas as it does in Montana

Response: We are not aware of what the definition of primitive and semi-primitive are in the Montana FP The definitions in the TX DEIS are out of the ROS handbook

Letter: 1600 Both the Plan Summary and the main body of the Draft Land Use Plan state that the Angelina and Sam Houston Forests will build 250 miles of trail Only in Appendix B does the truth come out that the southern Angelina will be limited to 50 miles of trails A citizen reading only the Plan Summary would assume that each Forest would build 125 trail miles Such a citizen may have submitted very different comments had he known the truth

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: The plan summary can not provide detailed information The FP is written to provide direction to the district personnel to manage the resources on the ground

Letter: 1723 (pg 64, DEIS) I am against chopping, shearing, scarifying, ripping, piling, raking, bedding, disking, and herbiciding for site preparation You do not give all the environmental impacts of these uses on soil microbes, fungi, salamanders, and other creatures as well as soil erosion, compaction, rutting, water pollution, and other environmental damage The EIS for Vegetation Management is obsolete because it ignores the impacts on salamanders, fungi, soil microbes, and other effects that these activities have

Response: The DEIS states "The environmental effects of these site prep methods are fully documented in the FEIS for Vegetative Mgmt in the Coastal Plain/ Piedmont (1989), on p 64 The Veg. Mgmt. FEIS addresses the impacts to soil biota, reptiles, invertebrates, amphibians & aquatic invertebrates (see VM FEIS chapter IV & App A), as well as vertebrate species While the env impacts of chopping, shearing, scarifying, ripping, piling, raking, bedding, listing, and herbiciding for site prep have not been exhaustively researched, we have inferred from the research that has been completed that the env impacts to soil microbes, fonji, etc , will not be significiant

Letter: 1838 We recommend that a summarization of the control actions and standards specified in the 1987 Southern Pine Beetle Control EIS be provided in the FEIS for the beneift of readers We found too much emphasis in the DEIS on the incorporation by reference to the other three regional programmatic documents (the SPB, Veg Mgmt, and RCW EISs) without the benefit of discussing decisions made as a result of these environmental analyses

Response: Standards derived from the SPB EIS are noted in the FP The SPB EIS is widely available, and its length and detail make it appropriate for incorporation by reference

Letter: 1723 *The Forest Plan must determine how many acres can be drilled Yet you are essentially saying, that all acres can be drilled there is no* environmental analysis to back up such a broad claim of environmental insignificance

Response: Only mineral leasing availability is determined in the plan Where to drill is a site-specific decision

Letter: 1679 Who wrote each part of the EIS and Draft FP What are the credentials including training and experience of the members of your interdisciplinary team

Response: See Chapter IV of the EIS

Letter: 1310 The Draft Plan does not respond sufficiently to the demands of the public for major reforms It is still 90 percent business-as-usual

Response The EIS addresses all significant issues raised during scoping The IDT is not clear as to what this comment refers to

Letter: 1723 (pg 45 DEIS) it says that uneven age management will produce a minimal amount of early successional habitat but on page 30 you show it will produce 15,000-28,000 acres by period 1 In addition you never talk about the excess of even age habitat that exists on private lands that are adjacent or nearby NF lands You need to show the landscape perspective also Also by period 5, 0-15 yrs. of early successional habitat will be on 371,000 acres of NF for Alt 6 & 7 This does not seem minimal to me

Response: This table reflects Forplan outputs Alt 6 was modeled with 10% EAM & the Forplan model chose to take the majority of EAM during the first period

Letter: 1723 (pg 85 DEIS) why is there only one alternative with the court ordered RCW plan? Since this plan has helped slow the decline of the RCW why do you ignore how it has helped?

Response: The court-ordered plan for the Mgmt of the RCW in Texas was determined "to likely jeopardize the continued existance of the RCW" in a biological opinion issued by the FWS. For this reason, only the current situation, Alt 1, used this strategy

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 85 DEIS) In addition no other alternative has specific linkages Since this is required by the RCW DEIS why would you ignore this and saddle some alternatives with a lack of requirements that will be court required?

Response: The RCW EIS does not require linkages between HMA's

Letter: 1723 *you do not study appropriate alts but you must study "all reasonable alts " as required by CEQ regulations*
Letter: 1723 it is important for the FS to use the right terminology from CEQ regulations. It is not a "reasonable range of alternatives" that CEQ talks about but "all reasonable alternatives " In my mind this is very different from a "broad range of reasonable alternatives."

Response: The CEQ regulations state that an EIS "shall provide full & fair discussion of significant environmental impacts & shall inform decisionmakers & the public of the reasonable alts which would avoid or minimize adverse impacts or enhance the quality of the human environment Agencies shall focus on significant environmental issues & alts & shall reduce paperwork & the accumulation of extraneous background data " (40 CFR 1502 1) The CEQ regulations also require that "The range of alts discussed in environmental impact statements shall encompass those to be considered by the ultimate agency decisionmaker. (40 CFR 1502 (e)). Agencies must also "Rigorously explore & objectively evaluate all reasonable alts , & for alts which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated FS regs that incorporate & implement these CEQ regs into the NF System Land & Resource Mgmt Planning are found in 36 CFR 219. Among these requirements is a provision to "formulate a broad range of reasonable alts according to NEPA procedures The primary goal in formulating alts , besides complying with NEPA procedures, is to provide an adequate basis for identifying the alt that comes nearest to maximizing net public benefits, consistent with the resource integration & mgmt requirements of 219 13 - 219 27 Alts shall be distributed between the minimum resource potential & the maximum resource potential to reflect to the extent practicable the full range of major commodity & environmental resource uses & values that could be produced from the forest Alts shall reflect a range of resource outputs & expenditure levels (36 CFR 219 12 (f)) The process that the NFGT used to develop alts is discussed at length in the EIS, Chapter 2, pages 11-14 The alts were developed by an IDT, District Rangers, & their employees, & the Mgmt Tean in response to the issues generated through public involvement by individuals, special interest groups, & other agencies The development process has been an ongoing process since then & until the analysis found in this document was completed (EIS, Chapter 1, page 9) While the number of alts that could be developed & analyzed for an area as large & diverse as the NFGT is infinitesimal, a reasonable range of alts was explored to meet the CEQ & FS Planning regulations

Letter 1723 please explain what the systematic interdisciplinery approach consists of?

Response: The phrase "systematic interdisciplinary approach" comes directly from the NEPA, section 102, where it states that all agencies of the Federal Government shall "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural & social sciences & the environmental design arts in planning & in decisionmaking which may have an impact on man's environment " The NFMA requires that Forest Plans "be prepared by an IDT (16 USC 1600, sec 6 (f) (3)) The IDT approach for planning is detailed in the NFS LRMP regs, 36 CFR 219 5, which states, in part, that "A team representing several disciplines shall be used for regional & forest planning to insure coordinated planning of the various resources Through interactions among its members, the team shall integrate knowledge of the physical, biological, economic & social sciences, and the environmental design arts in the planning process The team shall consider problems collectively, rather than separating them along disciplinary lines " The same section of the regs continues with a listing of the functions of the IDT as well as guidelines for responsible line officers in appointing IDT members

Letter 1310 SMZ's need to be discussed as a separate issue. The FEIS needs to fully discuss all facets of this issue
Letter: 1605 SMZ's need to be discussed as a separate issue The FEIS needs to fully discuss all facets of this issue

Response: SMZ's are discussed throughout the FEIS in the Biological, Physical & Social Environments according to standard EIS format

Letter: 1723 (pg 3 DEIS) it is never stated what the Regional Guide is and the constraints set out by the 1990 Resources Planning Act Program What did these documents add to this FP's mandates and how did they constrain it?

Response: The many guidance documents used in the development of the EIS & Plan (including 1990 RPA) are just that, guides These do not establish constraints or mandates

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 46 DEIS) special management areas as being negative for the economy because timber or other commodity production is not allowed you do not admit that economic benefits also acrew due to the recreational dollars that are drawn in the local community as people come and visit these beautiful places you do not try to value other benefits that these areas generate You do not give an even handed analysis of economics when it comes to special management areas

Response: All considerations (commodity & non-commodity) are used in the FORPLAN analysis, including estimated influences due to recreation & aesthetic values

Letter: 1723 (pg 11 Plan) how much has each RCW population increased in each forest? According to Warren Starnes at the Trails Workshop on 11-30-94 the RCW populations in the Texas NF have not stopped declining yet

Response: The FEIS details the RCW increase through 1995

Letter: 1679 The Draft FP does not reflect details of monitoring the effects of even-age cuts

Response: Monitoring of objectives & actions to meet objectives is described in Chapter V Details of these monitoring actions are described in Plan App G effects of actions on the biological & physical environment due to timber harvest, both even & uneven aged is described

Issue: 13-2 Public involvement (process & opportunity)

Letter: 1409
I would like to see corporate sponsors for each section of the trail (LSHT) It would be a service project for their company and a group for each section leader to work with

Letter: 1605 Guidelines and requirements to be followed in performing site-specific analyses need to be developed and published in order to ensure completeness and adherence

Letter: 1723 (MA-8a-B2) the public must have full input into management and other decision-making

Letter· 1723 When new trail proposals are initiated various user groups should participate to ensure that trail location will not impact their uses and to help find the best location so that environmental harm is minimized and areas that can take more abuse are chosen for the routes

Response: Comment noted

Letter· 1614 The Draft EIS Summary alludes to a current USFS goal of responding to the demands of the public I find no fault with this premise if a means can be identified that allows FS planners to hear from the public Sierra Club membership is just over 500,000 If you received comments from every single Sierran and an equal number from wise use advocates, you would be hearing from less than 1/2 of 1% of the American public Even if you add all 27 members of TCONR, you still don't have the equivalent of a drop in a bucket Consequently, I implore you to take guesswork, false assumptions, and arrogant presumption out of NF mgmt USFS still has professionals who KNOW how best to manage forests Good mgmt is what you were trained for and is still what the public most needs from you Most of what has been called anti-timber public comment has in fact been elitist babbling from a relative handful of coercive utopians whose ultimate goal is to drive loggers out of American forests

Letter: 1614 On Nov 8, 1994 we heard from the American public The message (public comment) most of us heard was a public desire to return to the basic, down-to-earth, proven standards and values that made America the preferred alternative of immigrants from all over the world If official USFS policy is to accede to the demands of the public respecting forest management than read your orders from Nov 8 and manage our forests according to the best management possible consistent with the silvicultural standards you learned in forestry school and have seen proven in practical application

Response: The IDT appreciates your support

Issue: 13-2 Public involvement (process & opportunity)

Letter: 1605 Regarding proposed new developed and Semi-Primitive recreation sites, no requirements are mentioned for site EIS or public comment

Response: Site specific information will be gathered and provided for public comment when the project is funded

Letter: 1723 FW-023 - you are cutting out the public by not allowing them to participate in developing the guidelines for protected habitat for threatened, endangered, and exemplary plant communities It is standards, not guidelines that are needed so that the FS cannot be so flexible

Response: The IDT relied on documented research & specialist's input in developing this document Review by state & federal agencies with expertise in the area have indicated this is adequate in a programmatic document

Letter: 1632 Relevant to the Plan, the inherent nature of the scoping process at the program and project level does not sufficiently empower the public to influence management direction

Response: The NFGT Planning Team followed the direction in the NFS LRMP regs in 36 CFR 219 6 for inviting public participation in the preparation of the EIS & FLRMP A number of federal, state & local government agencies, organizations & individuals were contacted & invited to participate in the planning process (for a list of these, see the EIS, chapter V) While these procedures may not be to the liking of everyone, they are the procedures we must follow until they are revised

Letter: 1723 (pg 229 plan) in other forests some of the interested public are allowed to participate with the interdisciplinary team for site specific projects Why is this not true with Texas NFs?

Response: The public can participate with interdisciplinary teams (IDT) and attend meetings provided that meeting participation is open to everyone However, only federal employees can be members of an IDT This policy is found in the FS NEPA Handbook, FSH 1909 15, sec 12 1 "The team will consist of whatever combination of FS staff & other Federal Government personnel necessary to provide the necessary analytical skills " Continuing in this same section, "Others may aid or support the interdisciplinary team as determined to be necessary by the responsible official This participation must be consistent with the Federal Advisory Committee Act of 1972 (5 USC 86 stat 770, USDA Dept Reg 1041-1, 11/13/89) " The CEQ regs provide much latitude to the agency & responsible official in determining how to conduct public involvement (see 40 CFR 1506 6) Info on techniques to involve the public in FS planning & decisionmaking is found in the FS Public Participation Handbook, FSH 1609 13

Letter: 1723 (pg 7 DEIS) for planning the interdisciplinary team needs to have meetings open to the public at times the public can attend This should occur for both this FP and the site specific interdisciplinary teams that will occur later

Response. The NFGT Planning Team followed the direction in the NFS LRMP regs in 36 CFR 219 6 for inviting public participation in the preparation of the EIS & FLRMP A number of federal, state, & local government agencies, organizations, & individuals were contacted & invited to participate in the planning process (for a list of these see the EIS, Chapter V) For site specific projects, the responsible official has considerable latitude in determining how to inform & involve the public provided that the requirements of the Federal Advisory Committee Act of 1972 are met

Letter: 1723 (pg 4 plan) describe what the process will be for "development, review, and accomplishment of project implementation by public involvement and participation"

Response: The process for public involvement & participation in projects implementing the Revised Plan is discussed in the Plan, Chapter V in the Public Involvement section of the NEPA Project Requirements subheading

Letter: 1723 (pg 4 summary) the public should have been invited to formulate alternatives also

Response: Issues & dealing with issues within various alts has been a common thread throughout the planning process

Issue: 13-3 Research Needs and New Ideas

Letter: 1632 As RCW management progresses, research needs to be done to determine RCW tolerance of a wider range of conditions than is currently being prescribed RCW management should not be single-species management This must be quantified in the plan

Letter. 1648 I am concerned that planning cycles and short rotation ages lead to a short-sighted perspective "Long term sustained yield" means thinking 500 years ahead at a minimum As we do not yet have the science to really know how what we do will affect the forest on this scale, all decisions should be aimed at absolute minimum impact on the forest This perspective will better assure that the forest values we need are truly managed to be sustainable

Letter: 1679 Grazing research should not be done in research areas. More research natural areas should be created

Letter: 1723 (pg 31 Plan) the plant inventory is not complete and a lot of species have been added to it since 1990

Letter: 1723 MA-8d-71 - the responses to these natural and human disturbances nearby must be measured to ensure that you know what impact they are having on the botanical area

Letter: 1723 you need to establish via a fire history research program what the natural regime, frequency, intensity, and seasonability of fire was for each stand

Response: Comment noted

Letter: 1632 I recommend the initiation of a biological data base to provide comprehensive and centralized access to information regarding sensitive plant populations, fragile habitat areas (bogs, wetlands, barrens, etc) champion trees, and other biological resources that should be protected Past degrade of sensitive areas could have been avoided if land managers had prior knowledge of their existence The data base will also provide for new discoveries and additions Such comprehensive information is sorely lacking and necessary for adequate protection

Response. Recommendation noted

Letter: 1679 Research is needed to define wildlife minimum area requirements and establish how fragmentation affects each species

Letter: 1723 Other research includes the effects of timber cutting and site preparation on salamanders, soil fungi, and soil micro organisms I have talked to Elaine Ingham of Oregon State Universtiy who is doing work on the effects clearcutting and other forest practices have on soil fungi and microbes and she is willing to test soils in the Texas NF

Letter: 1723 (pg 39 #2 Plan) I am concerned about research that looks at the need for various Forest management practices The phrase is so subjective that it can mean anything from protecting riparian areas to allowing logging in riparian areas This is not a good example of developing specific questions that you want answered about a research topic

Letter: 1723 (pg 19 Plan) you mention several research projects that have been initiated. What are the preliminary results of this ongoing research?

Letter: 1723 It is very distressing to see the research needs that were developed for the 1987 LRMP are not being researched .. This is a backlog of research that you are supposed to do, that was put in the last plan, and which you have not carried out

Letter: 1723 (pg 33 Plan) you fail to mention the research that is ongoing on the Canebrake Rattlesnake and the Louisiana Pine Snake You need to talk about the management implications of the research to date on these two species.

Letter: 1723 (pg 31 Plan) what are the results to date of the Southern Forest Experiment Station research that was carried out from the list compiled?

Letter: 1723 (pg 19 Plan) public input into research programs is needed. Not just once for the LRMP process but continually throughout the 10 year plan period

Letter 1723 (pg 41 DEIS) you need to list the research that has been initiated and finished and the results so that reviewers can see what research has been done and how it has been applied to NF management

Response: Research information provided in FP chapter III is not intended to detail all projects or all specific aspects of past, present or future research investigations It is beyond the scope of the FP and EIS to provide this detail.

Issue: 13-3 Research Needs and New Ideas

Letter: 1808 Chapter III, Current Research Needs, 1. Habitat requirement and ecosystem function, p. 36. A review of the current research needs suggests that the science of ecosystems mangement is relatively new, local ecological classification types have not been completed for the NFs in Texas, and there is a lack of knowledge regarding occurrence and habitat requirements of Federally-listed species. Therefore, standards should be developed (for each management area) which allow amendments in species and habitat management as new information is obtained from species surveys and ecological classification identification.

Response: The IDT agrees. S&G's have been added to the biodiversity section(s) to reflect this.

Letter: 1310 Available research on the use of pheremones and on SMA's has not been incorporated into the Draft Plan. Why should anyone believe that other research identified as needed would be acted on in the future?

Response: FW-075 addresses this issue. Pheremones cannot be operationally used until approved by the EPA.

Letter: 1808 New techniques, using behavioral chemicals, to control SPB infestations are being studied and have been successful. It is recommended that a forest-wide standard and guideline be developed in the Management Plan and in each of the management areas to adopt these new techniques after they are approved and an amendment is made in the EIS for the suppression of the SPB in the southern Region.

Response: That is our intent FW-075 addresses this issue.

Letter: 1723 (pg 39 #5 Plan) .. you need to differentiate that the birds being transferred are pairs of juveniles and not adults.

Response: This is detailed in the RCW EIS which this document incorporates

Letter: 1723 (pg 33 Plan) it is of great concern that management practice guidelines for prescribed fire, riparian area management and other wet areas, insect and disease control, wildlife plantings, nest box installations, old growth bottomland hardwood management, snag retention, pine-hardwood management type, pine shelterwood, regulated single-tree selection for uneven-aged stand structure, group selection in upland pine-hardwood habitat, seed-tree management, clearcutting, uneven-aged stand management and natural control area with no activities are not set-up yet The public needs an opportunity to comment on these . This LRMP must allow this open, public input to occur. How will you do this?

Response: These are project-level decisions which require full compliance with NEPA

Letter: 1671 Whatever management alternatiwe is ultimately selected, this Department strongly encourages options which will allow flexibility in management so that changes can be adopted as new information from the ECS becomes available

Response: The IDT agrees

Issue: 13-4 Alternative Preference/dislike/modification

Issue: 13-4-1 Alternative 1

Issue: 13-4-1-1 Like - Alternative 1

Letter: 857 I support Alternative 1

Issue: 13-4-1-1 Like - Alternative 1

Letter 888 At minimum, Alternative #1 should be left in place
Letter: 1320 I am writing concerning the use of the Grasslands I am well satisfied with our current management and would like to continue using it
Letter: 1458 I support open (ORV) use of our National Forest Alternative 1
Letter 1467 I encourage you to adopt alternative #1 or #2
Letter: 1585 I have read the alternatives and support alt #1
Letter: 1629 My preferred alternative is 1 or 2
Letter. 1642 I support alt #1 of issue #4 of the Land Management Program
Letter: 1643 I support alt #1 of issue #4 of the ORV program
Letter: 1650 I support the ORV plan in alternative one
Letter. 1767 I realize the USFS is under a federal mandate to protect the RCW, I feel that the current plan is adequate Alt 1 would seem to be closer than any of the others but still falls short in several respects

Response: Comment noted

Issue: 13-4-1-2 Dislike - Alternative 1

Issue: 13-4-1-3 Modify - Alternative 1

Issue 13-4-2 Alternative 2

Issue· 13-4-2-1 Like - Alternative 2

Letter· 1308 I most strongly support alt 2 This alternative costs less to implement than the preferred alternative (4b), it allows for more timber to be harvested (which, of course, will be followed by regeneration), it allows for ample small game habitat, it has the greatest payback to counties, it doesn't call for excessive road construction, and RCW habitat continues to meet court-mandated guidelines
Letter· 1603 The Council supports alternative 2 which emplasized commodity production while providing necessary RCW Habitat as identified in the RCW draft guidelines
Letter 1614 Although Alt 1 (no change) offers the greatest theoretical harvest volume, the lowest USFS budget requirement and continued coddling of special interest groups, it would be pointless to favor Alt 1 because of the official finding of a "need to change" Therefore, my preferred alternative is Alt 2
Letter: 1618 I prefer Alt #2
Letter: 1627 I favor activities in alt 2 maintain the health and productivity of the forest
Letter: 1634 I prefer alt 2 which emphasizes tree farming while still providing for RCW & other interests
Letter. 1651 I support alt 2 which emphasized commodity production while still providing the minimum RCW Habitat Management area as identified in the RCW EIS
Letter: 1676 ,,, I am supporting alt 2 of the alts being reviewed at this time regarding the NF use
Letter· 1677 I would like to endorse alt 2 of the DEIS

Issue 13-4-2-1 Like - Alternative 2

Letter: 1755 we support alt 2 This alternative will allow for a considerable larger harvesting of timber, which we hope will cure some of the pine beetle problem

Response: Comment noted

Issue: 13-4-2-2 Dislike - Alternative 2

Letter. 1723 (pg 17-19 DEIS) Alt 2, I am against any emphasis on commodity production since this is against the law and will ensure that RCW will not do well You allow monocultures to occur here and in the general forest, you allow open riding ORV areas, short rotations, even age management

Response: Comment noted

Issue: 13-4-2-3 Modify - Alternative 2

Issue: 13-4-3 Alternative 3

Issue: 13-4-3-1 Like - Alternative 3

Letter. 1256 I favor Alternative 3 as the first choice and Alternative 4a as a second, but less desirable, choice Among advantages of Alterntative 3, in my professional opinion, are. 1) Reduced susceptibility to a major pest, the southern pine beetle , 2) higher production of commodities and payments to counties from scheduled harvests of timber , 3) less need for road reconstruction , 4) reduced costs of management, compared to Alternative 4b, a projected savings of $1-2 million annually, 5) sufficient habitat to ensure RCW recovery and stability

Letter. 1438 Alt 3 appeals to me because it comes fairly close to a harvest regime that equals the growth of the forest while maintaining RCW habitat at an above minimum level required by law This alternative also appears to provide amenities at a moderate level

Letter: 1733 Overall my choice is alt 3 of the DEIS

Response: Comment noted

Issue: 13-4-3-2 Dislike - Alternative 3

Letter. 1723 (pg 20-21 DEIS) Alt 3, again this alternative has too much commodity orientation There must be no open riding ORV areas, rotation ages need to be longer, even age management needs to be abandoned, the RCW needs older trees, mineral drilling needs to be reduced, and grazing must be reduced

Response· Comment noted

Issue: 13-4-3-3 Modify - Alternative 3

Issue: 13-4-4 Alternative 4

Issue: 13-4-4-1 Like - Alternative 4

Letter: 1723 (pg 21-22 DEIS) Alt 4 maximized RCW management which is really a way to hide maximum timber production and reduce hardwood competition I am against even age management and want Nebletts Creek, Big Woods, and the Angelina River protected

Response· Comment noted

Issue: 13-4-4-2 Dislike - Alternative 4

Issue: 13-4-4-3 Modify - Alternative 4

Letter. 652 I support alternative (4b) if the wording were changed to allow the open riding area
Letter: 1585 Alt #4 would become my first choice if it were reworded to allow the open riding areas to remain open while the additional 200 miles of permanently marked trail are built and added to the existing 50-55 miles of PMT This would reduce the load on the existing trail system suffering from over usage already

Response: Comment noted

Issue: 13-4-5 Alternative 4a

Issue: 13-4-5-1 Like - Alternative 4a

Issue: 13-4-5-2 Dislike - Alternative 4a

Letter: 1723 (pg 21-23 DEIS) Alt 4a, I am against even age management What does managed as an urban forest mean? You never tell how such forests are different, what special guidelines or standards they have, how their mission differs from the other forests I oppose open ORV areas and the rotations are too short for RCW and OG areas

Response: Comment noted

Issue: 13-4-5-3 Modify - Alternative 4a

Letter: 888 Alternative #4, 4a, 4b would be preferable IF the currently designated Open Riding Area (bound generally by Stubblefield Lake Road, FM 1375 and FM 149) is left open until the balance of the proposed 250 miles of designated trail is complete

Letter: 1619 I prefer alt 4A except must increase SPB suppression, timber harvest should be increased, RCW receiving excessive consideration, Herbicides should be allowed extensively

Response: Comment noted

Issue: 13-4-6 Alternative 4b

Issue: 13-4-6-1 Like - Alternative 4b

Letter: 990 Alternative 4b seems the best Please no more land given to Wilderness Areas

Letter: 991 I concur with the selection of Alternative 4B as the preferred alternative for the longterm management of the National Forests and Grasslands in Texas

Letter: 1409 the plan should be a balanced plan that does not favor any one group of people Alt 4B seems to be the most balanced

Letter: 1436 I agree with your selection of alt 4B as providing the most benefit for everyone involved and at the same time managing the resources of our NF for generations to come

Letter: 1581 I am pleased with your new Land Management Draft revision We are looking forward to 250 miles of ORV trails

Issue. 13-4-6-1 Like - Alternative 4b

Letter: 1763 Overall, the preferred alt presented in the Plan represents an earnest attempt to integrate traditional multiple-use activities with other resource values of the lands in your stewardship In this regard, the Plan shows promise for establishing ecosystem-based management
Letter: 1775 I firmly agree to the preferred alternative 4B
Letter· 1808 We support implementation of the preferred Alt 4b, as it related to RCW management and establishment of RCW HMAs
Letter. 1838 We concur with the USFS's determination that Alternative 4b establishes a fair balance in meeting the economic needs of the various forest and grassland users and local counties, while providing for the protection of RCW and other natural values In addition, this alternative supports the stated objectives of the NFGT Revised Forest Plan
Letter. 1838 EPA rates this proposed action/DEIS as "LO", i e , EPA had "Lack of Objections " Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions

Response Comment noted

Issue: 13-4-6-2 Dislike - Alternative 4b

Letter: 7 I wish to express my opposition to Alternative 4b because It continues the destructive system of even-age logging (clearcutting, seedtree, shelterwood cutting), large group selection ("patch clearcuts") and heavy salvage, The annual Allowable Sale Quantity of 101 6 million board feet is too high, Trails and streams are not adequately protected, Too much emphasis is placed upon commodity production (timber, oil, gas, grazing) at the expense of ecosystem protection (biodiversity, soils, old growth, wildlife)
Letter 97 I oppose Forest Service Management Plan, (Alternative 4B, Draft EIS)
Letter· 102 I am critical of, and in opposition to, the recent Draft Land & Resource Management Plan because it continues to allow destruction of more trees and land and doesn't adequately protect present trails and streams
Letter 103 I am not satisfied with Tx Forest Plan which emphasizes even age logging I believe income will be more fairly distributed throughout communities when individual loggers can make independent livings doing single-tree selection
Letter 200 The proposed policy is appalling A careful review of it reveals that it is nothing more than a continuation of the transformation of Texas' forests into tree plantations
Letter· 222 I have very strong feelings regarding the FS's recent Draft Land and Resources Management Plan (Alternative 4b, Draft EIS) because The board feet amount per year is far too high
Letter: 230 I *express my opposition to* Alternative 4b, Draft EIS
Letter: 417 I oppose this draft FS plan as it places too much emphasis on timber, oil, gas, and grazing operations at the expense of ecosystem protection (biodiversity, soils, old growth, wildlife) and preservation for the future generations
Letter 722 Alternative 4B, Draft EIS is heavily weighted towards timber, oil, gas, grazing, etc with inadequate protection for wildlife, biodiversity, old growth, etc We need protected areas as well as industry
Letter. 1257 Alternative 4b is NOT satisfactory because it emphasizes business as usual commodity production is more important than ecosystem protection and recreational use
Letter. 1309 This office believes Alt 4B, the alt preferred by the NFGT does not offer as much protection to areas with a high probability for containing historic properties as do alts 6 and 7
Letter. 1310 I like the proposal to protect more of the forest as special areas However, the balance between protected areas and areas devoted to timber management is still extremely lopsided
Letter· 1310 *represents some decrease in ASQ from the prior plan, actually just brings the ASQ in line with current excessive logging*
Letter: 1453 There is an excessive emphasis on timber production at the expense of a diversity of more sustainable nonconsumptive uses
Letter: 1600 have led me to support alternative 1 or 2 I feel the Forest Service's preferred alternative 4B is a misguided attempt to regain control of Forest Service policy from the federal courts

Issue: 13-4-6-2 Dislike - Alternative 4b

Letter: 1603 The Council opposes the preferred Alt 4b Our comments point to the shortfalls of Alt 4b and to specific problems in the planning method used by the forest

Letter. 1605 We find many failings and faults with the preferred alt 4B

Letter: 1631 I regret that you have chosen alt 4B . I do not agree with your opinion that it is the best combination to meet needs for endangered and threatened species, ecosystem integrity, and multiple-resource sustainability Alt 4B continues the destructive system of even-aged logging whereas, selection management should be used for all commercially available national forest land in Texas

Letter: 1634 Alt 4B severely restricts the income producing potential of the timber lands while overemphasizing RCW management I think the birds will survive in a managed & active tree farm

Letter: 1640 Alt 4B allows serious habitat and wildlife disturbance with ORV's going cross country in 1/2 the forest, along with 250 miles of new trails

Letter: 1723 (pg 23-24 DEIS) Alt 4b, I am against the large MA-2 and HMA which includes all of SHNF You will reduce hardwoods too much here I am also against even age management and open ORV areas The rotations are too short for RCW and urban forest is not explained

Letter: 1733 I disagree with 4B as the preferred choice

Letter. 1765 Alt 4B of the DEIS fails to meet the "Multiple-Use" criteria as required by law Further, by your own figures, it does not comply with prudent forest management practices and stewardship of public lands The annual ASQ proposed (101 6 MMBF) exceeds the sustainable board feet yield for this forest by 50%' Your proposed rate of cutting cannot protect the natural ecosystem diversity of plants and wildlife communities

Letter: 1801 members will be injured in their enjoyment of the forests if the agency's preferred alt in the draft plan is adopted The preferred alt 4B provides inadequate protection for sensitive natural areas, such as streams, trails and candidate wilderness and special areas It calls for excessive timber production goals and continued reliance on "even-aged" logging, to the detriment of the forests' rich biodiversity and other multiple-uses

Response: Comment noted

Issue· 13-4-6-3 Modify - Alternative 4b

Letter: 233 I am opposed to the new Draft Land and Resources Management Plan (Alternative 4b, Draft EIS) on several points

Letter: 858 Alternative 4B (with the exception of reducing MA-2 to around 30%) is the most fair plan for all interests

Letter: 887 I am in favor of the preferred alt (4b)

Letter: 994 My preferred alternative would be 4b if the wording were changed to "Open Riding Area" (Sam Houston NF) would remain open until the total amount of designated trail is in place and open for use

Letter: 1226 like to go on record as supporting the preferred alternative (4b) with the following changes The open riding area should remain open until the proposed trail additions can be put in place Our existing designated trail system is over used now We need to do everything possible to cut down on the concentrated use of this resource The open riding area must remain open until the designated trail system can be expanded to the proposed plan

Letter: 1281 Alternative 4B seems to be the most acceptable plan, with a few changes Since the LBJ Grasslands is located near the Metroplex, I feel there should be less emphasis on grazing and more emphasis on wildlife management and recreation

Letter: 1599 supports the preferred alternative 4b, with the following change The open riding areas should remain open until the proposed trail additions are established Closing the open areas would only cause heavier use of the existing trail system

Letter: 1629 I could support 4B, if the number of miles were increased to 100 or more If 4B is selected, no old or existing trails should be ceased until the new trail system is in place .

Letter: 1642 I would rather support alt 4B if it were written to keep the Open Riding Area as it currently is until more trail mileage is added to replace it

Letter. 1643 I would rather support alt 4B of the plan if it prevented closure of The Open Riding Area until more mileage is in place

Issue: 13-4-6-3 Modify - Alternative 4b

Letter: 1650 I would also support alt 4B if the wording was changed so that the Open Riding Area would stay open until the total amount of designated trail is in place If the Open Riding Area is closed before the designated trails are in place it would create even more use of the existing designated trail The existing designated trails are multi use trails, not just ORV trails Since the existing plan went into effect in 1987 there has not been any trail added to the designated trail system

Letter· 1655 the preferred alt 4B offers a good plan for meeting the multiple use goals of the FS . Before we can fully support , we would like to see the following issues addressed in the plan (letter 1655)

Letter: 1769 We support the preferred alt (4B), although it should be slightly modified

Letter: 1802 proposed decision seriously conflicts with the social objectives as outlined in the DLRMP (Plan IV-46), "Provide a broad spectrum of dispersed and developed recreation opportunities to accommodate public demands " we urge these revisions 1)retention of open OHV use in the Angelina NF, 2) Immediate expansion of the designated trail system in the Sam Houston to 200 miles, 3) Recognition and accommodation of Four Wheel Driving as a necessary and valid recreation, 4) Remove discriminatory references to OHV use and treat OHVers on an equal basis with other recreationists

Response: Comment noted

Letter: 216 Please understand that I appreciate your efforts to manage the forest professionally please understand that I propose the continued use of the area (Angelina Forest-Boykin) under an OPEN FOREST concept

Response: Improperly located trails and overuse of areas accelerate erosion of areas when it rains Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage

Letter: 1281 Units 29, 30 & 75 should be changed from grazing to wildlife management and recreation We would also like to see these three units, plus unit 34 dedicated as a permanent field trial grounds

Response:

Grazing emphasis will not preclude wildlife mgmt & field trial activities

Issue: 13-4-7 Alternative 5

Issue 13-4-7-1 Like - Alternative 5

Issue: 13-4-7-2 Dislike - Alternative 5

Issue: 13-4-7-3 Modify - Alternative 5

Letter: 1723 (pg 24-25 DEIS) Alt 5 rotations are too short but I support additional wilderness and special interest areas and like the deemphasis in oil and gas drilling and grazing

Issue: 13-4-7-3 Modify - Alternative 5

Response: Comment noted

Issue 13-4-8 Alternative 6

Issue: 13-4-8-1 Like - Alternative 6

Letter: 4 I support their (TCONR) decision on the prevention of clearcutting I still think that the related techniques are more than plenty

Letter. 7 I urge you to implement Alt 6 with these major elements Timber harvest using single-tree selection mgt without herbicides, An ASQ of 62 9 MMBF (including salvage), a sensible compromise between zero-cut, park-like management, and intensive commercial timber mgt, No cutting, except for hazard trees, or burning within 150 ft of designated hiking trails, like the Lone Star Hiking Trail, Four C's Trail, Trail Between the Lakes, and Piney Creek Horse Trail, No cutting or burning inside SMZ's (150 ft from perennial streams, 100 ft from intermittent streams, 75 ft from ephemeral streams), No ORV use off of designated ORV trails Stabilize current trails to stop gullying and erosion No new ORV trails until current trails are brought up to standard, Protect Longleaf Ridge (30,000 acres) and Big Creek Area (6,000 acres) as special areas, and expand Winter's Bayou Scenic Area to 1700 areas, No leasing of federal minerals in scenic or botanic areas, nor within streamside or trail corridors

Letter· 97 I urge you to implement alternative 6 EIS

Letter: 102 Please re-consider using alt 6-DEIS which has been carefully thought out to protect our woodlands for future generations

Letter: 105 We support Alternative 6, etc

Letter· 114 I am writing to ask you to consider Alternative 6 of the USFS Draft Forest Plan in Texas

Letter: 116 I wish to express my support of the compromise Forest Management Plan (Alternative 6, Draft EIS) This plan protects trails, endangered species and nearby streams This plan also balances jobs and protection of the environment Please consider the plan as a compromise among various interests

Letter· 117 I write you to support Alternative 6 without herbicides

Letter 222 There is a plan that is much better suited for the job that you are empowered to do That plan is Alternative 6, Draft EIS, or the Compromise Forest Management Plan

Letter· 226 Please implement the Compromise Forest management plan (Alt 6, Draft EIS) as a more balanced commercial/ecological plan

Letter. 230 I urge you to implement Alternative 6 of the Draft EIS

Letter: 233 please implement Alternative 6, Draft EIS

Letter: 277 recommend the adoption of the Compromise Forest Management Plan (Alterntive 6, EIS)

Letter· 342 This letter is to express my support for Alternative 6 of the Draft Environmental Impact Statement

Letter 343 I urge you to implement Alternative 6

Letter: 368 I suggest Plan 6

Letter: 369 I prefer Plan 6

Letter. 370 Please adopt a plan similar to Alternative 6

Letter. 371 I support plan #6 as endorsed by The Sierra Club of Texas

Letter: 373 I support Alternative #6

Letter: 380 Please adopt EIS Alternative 6 .

Letter. 386 I am strongly convinced that Alternative #6 best reflects the philosophy for ecological management of our national forests

Letter: 389 Please Alt #6.

Letter: 391 The FS joined in the Partners in Flight initiative - please honor that commitment and implement Alter 6, Draft EIS

Letter: 414 I am in favor of the suggested alternate Plan 6, and would strongly recommend that it be adopted

Letter· 427 I strongly concur with placing more emphasis on the long term health of our forest resources and less on short term timber production

Issue: 13-4-8-1 Lake - Alternative 6

Letter: 503 Please adopt Alternative 6 with these major considerations 1 No herbicides (who determines which plants live or die), 2 Reduced annual sales, 3 No cutting within 300 feet of any stream (high water), 4 No ORV except on existing designated trails, 5 Protect areas of special significance (no cutting), 6 Phase out all grazing, 7 No drilling or mining in or near sensitive areas

Letter: 524 I prefer Alternate 6 of the EIS draft over 4b

Letter: 614 I would like to advocate that you go with the Forest Management Plan (Alternative 6, Draft EIS)

Letter: 648 I respectfully ask that your organization support Alternative 6 in the Draft Forest Plan without herbicides and with Longleaf Ridge National Recreation and Wildlife Area

Letter. 649 I feel the best and only alternative is Alternative #6

Letter. 961 (Alt 4b draft EIS) favors commercial exploitation over ecosystem protection I urge you to implement a compromise Forest Mgmt Plan (Alt 6 draft EIS)

Letter. 983 The only acceptable plan in your DEIS is Alternative 6

Letter: 1160 I favor alternative 6, Draft EIS

Letter: 1218 Our grand children & great children will know we protected a priceless treasure if Alternative 6, Draft EIS is implemented

Letter: 1257 Alternative 6 also makes the forests and grasslands look like I want them to look like in the future, Alternative 6 manages the land in a way that is closest to what I consider good management of the forests and grasslands please use Alternative 6

Letter: 1259 I am in favor of Alternative 6 of the Draft EIS

Letter *1260 A compromise (Alternative 6) would be good for government and environmental interests*

Letter. 1309 Alts 6 & 7 both greatly increase the width of the streamside and bottomland zones that are kept free from timber harvesting Although this management practice is primarily intended to increase biodiversity, it also will serve to protect historic properties, since these zones have the highest potential for containing archeological sites

Letter: 1309 Alts 6 & 7 both have the greatest number of Special Management Areas where impacts of all kinds, including those from recreation, are strictly controlled Again, by removing more areas from potential impacts, historic properties will fare better than under other alts Under the FS/SHPO Heritage Mgt Plan, additional historic mgt areas are proposed, which we believe should be considered to enhance cultural resource protection on the forests

Letter 1309 In our opinion, alt 6, which prohibits all ORV use, offers the best protection for cultural resources ORVs used in an off-trail setting during wet conditions can create serious ruts which damage shallow archeological deposits Alt 7, which eliminates open use of ORVs and confines such use to a trail system may be a more realistic compromise, since people who own ORVs are going to go somewhere to use them At least there is some degree of control of their use under alt 7

Letter: 1310 The ASQ and the land allocations are a better balance between commodity production and ecosystem protection and quality recreation

Letter 1313 Why is the FS proposing in the Draft Plan a continuation of this destructive system of even-aged logging and salvage? Perhaps the answer lies in the projected annual Allowable Sale Quantity of 101 6 million board feet This projection is too high, unsustainable, and simply poor management Alternative 6 of the Draft Environmental Impact Statement (Draft EIS) offers a compromise between a no-cut management, national park management, and your intensive commerical timber management

Letter: 1385 Alternative 6 represents the best compromise between commodity production and non-consumptive use

Letter: 1433 I believe the new Forest management plan should be alternative 6 in the (DEIS)

Letter: 1454 May you deem the alternative 6, draft EIS to be a viable compromise (to Alt 4B)

Letter: 1463 I urge you to adopt alt 6, which is much more sympathetic to the needs of wildlife and the general visiting public

Letter: 1465 I urge you to adopt Alternative 6

Letter 1567 Support Alternative 6 of the Draft EIS

Letter. 1597 Please support alternative 6

Letter: 1622 I recommend alt 6 over the other proposed alts

Letter: 1623 I urge you to support Alt 6 of Draft EIS

Letter: 1625 After considering all the alternatives in the EIS and reading all the information you have sent me - the alternative number six (6) closest fits my concerns for the future of our forests These great lands must be preserved for all - not exploited for the profit of the few

Letter: 1633 My overall comment would be to implement alt 6

Letter: 1640 I am opposed to the FS's alt 4B and urge you to implement alt 6

Letter. 1640 Alt 6 with no leasing in wilderness, scenic or biologic areas and elsewhere, not to be within 150' of streams or trails is recommended

Letter: 1640 Alt 6 is superior to alt 4B since alt 6 supports wildlife habitat quality and quantity by having over 2 times as many wilderness areas, research natural areas, wild and scenic areas and 2 more riparian/wildlife areas

Letter. 1640 Wildlife will have more nesting cavities, mast cover with alt 6

Issue: 13-4-8-1 Like - Alternative 6

Letter: 1658 Adopt alternate 6 of the DEIS, which I support
Letter: 1723 (pg 26-27 DEIS) Alt 6, I agree with uneven age management and like that there is no herbicide use I agree with the wilderness and special interest areas designations and agree to limiting ORV use I agree with limiting mineral extraction
Letter: 1723 the alt looks good and if you gave it a fair chance and were not so biased then it would be even a better alt than it is I object to your bias
Letter. 1776 I favor alt 6

Response Comment noted

Issue: 13-4-8-2 Dislike - Alternative 6

Issue: 13-4-8-3 Modify - Alternative 6

Letter: 51 1) Allowable sale quantity 62 9 million feet 2) No disturbance of streams 3) LIMIT ORV ACCESS 4) Protect Longleaf Ridge & Big Creek Area 5) Limit oil co's abuses 6) Make timber co's pay for the roads and timber
Letter: 58 Let's stop damaging the forest by cutting it down, spraying with herbicides, putting in stock animals which don't belong in a forest, driving 3 wheelers where they don't belong Let's leave it alone so we can see, feel and hear the forest for what it is

Letter. 81 Streams need additional protection
Letter: 349 I am writing in support of a forest management plan modeled after alt 6 of the DEIS The following should be implemented restricted cutting along designated hiking trails for 200 feet, no cutting and burning within 100 to 150 feet of streams, no further expansion of ORV trails but instead repair existing trails, no federal leasing in sensitive scenic or botanical areas of minerals and expand Winter's Bayou Scenic Area
Letter: 364 I am very much opposed to your management plan your plan promotes production rather than protecting and maintaining our forests for future generations I suggest no more than 50 million board feet annually
Letter: 366 I firmly support Alternative 6, but I do support prescribed burning
Letter 387 support Alternative #6 for the most part however, I would NOT support NO oil & gas exploration but keep it out of wilderness, stream corridors, etc I would urge that SMZ's be increased to 150 feet at least - with additional width for ephemeral and intermittent streams
Letter: 415 I would suggest no ORV use off designated ORV trails, no cutting except hazardous trees or burning within 150' of designated trails, timber harvest by single tree selection
Letter. 700 We don't want to see and smell herbicides, clearcutting, erosion and burning'
Letter: 1166 I urge you to implement alternative 6, Draft EIS with two major changes 1) designate Longleaf Ridge as a Recreational and Wildlife area instead of as a wilderness
Letter. 1228 I would like to see 2 Streamside mgmt zone- no prescribed burning 3 Hiking trails- no relocating trails for logging purposes, no prescribed burning, no pine beetle cuts, 150 ft corridor on each side of trail, 4 Off Road Vehicles- keep them on ORV trails a user fee could be used to get funds for these trails maintenance, 5 Southern Pine Beetles- no cutting at all in wilderness areas, streamside or trail areas, 6 Special Use Areas- increase Big Creek Scenic Area to 6000 acres, name Longleaf Ridge in Angelina NF as National Wildlife Recreation and Conservation Area
Letter: 1258 Alternative Number Six (6) of the Draft Revised Land and Resources Management Plan, with some modifications, seems best suited for that objective
Letter: 1310 I'd like to register my support for alt 6 with two changes one, that 24,000 to 30,000 acres of national forest land in the Longleaf Ridge area be designated a Conservation, Wildlife and Recreation area, and two, that federal oil and gas may be leased, except in wilderness, scenic, botanical and other special areas, with surface use stipulations forbidding occupancy within SMZ's and trail corridors

Issue: 13-4-8-3 Modify - Alternative 6

Letter: 1435 Several of the plans have good and poor features For example, plan 6 recommends selection cutting which is good, but prohibits mining which, if done properly, can be a viable part of the management plan

Letter: 1440 I urge you to implement alternative 6 (DEIS), with two major changes 1) Designate Longleaf Ridge as a Recreational and Wildlife area 2) Leasing of Federal minerals is acceptable except in wilderness, scenic or botanic areas, or within streamside and trail corridors

Letter. 1575 I support alternative 6 of the DEIS

Letter: 1605 We strongly support alt 6, with some changes, to wit, that Longleaf Ridge be designated a Conservation, Wildlife, and Recreation Area, and that federally owned minerals could be leased, except in wilderness or any type of special area

Letter: 1616 I support alternative #6 with 2 exceptions Exclude herbicide use and make Longleaf Ridge a National Recreation and Wildlife area instead of a wilderness area

Letter. 1617 I support aternative 6 with two exceptions Exclude the use of herbicides, and make Longleaf Ridge a National Recreation and Wildlife Area instead of a wilderness area

Letter: 1626 The plan that comes closest to my vision for how the National Forests in Texas should be managed is alt 6 However, this alt should be altered to allow the following Some use of controlled burning and limited mineral activity,

Letter· 1667 A straw poll taken at my work place yielded uniform support of (alt 6) A balanced approach, erring if necessary on the side of protection, was favored

Letter: 1765 Alt 6 of the DEIS is the preferred RESPONSIBLE option It should be modified to make the Longleaf Ridge and Big Creek areas, "Recreation" and/or "Conservation" areas and not be given "Wilderness" designation

Response: Comment noted

Issue 13-4-9 Alternative 7

Issue: 13-4-9-1 Like - Alternative 7

Letter: 959 I recommend that Management Area Alternative 7 be adopted by NFGT for the final LRMP, it provides a reasonable mix of timbering, grassland management, recreation, as well as the preservation and protection of streamside zones, wilderness areas, and special areas

Letter: 1723 (pg 27-28 DEIS) Alt 7, I am against herbicide use and I like the use of some prescribed fire I like limiting ORV use to current trails and reduced mineral development

Response Comment noted

Issue: 13-4-9-2 Dislike - Alternative 7

Issue 13-4-9-3 Modify - Alternative 7

Issue: 13-5 Goals Preference/dislike/modification

Letter: 1723 (pg 46 Plan) the FS needs a manual with pictures of all the sensitive plants and animals so that FS personnel, other resource agency personel, and individuals interested in sensitive species protection can help find where these species are in the forest and assist the FS in protecting them

Response Given sufficient funds, this might be accomplished

Letter: 52 Please set aside OUR forests for protection as natural areas and recreational use

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 1453 there is no alternative materials discussion in proposals for the RNA or the SFA Experimental Forest, nor in the section regarding Planning I see no mention of research or development on such paper pulp options as kenaf or hemp or sisal or cotton , nor on construction alternatives such as minimill steel framing, flyash concrete, rammed earth, caliche products, and so on

Response: Research information provided in FP chapter III is not intended to detail all projects or all specific aspects of past, present or future research investigations It is beyond the scope of the FP and EIS to provide this detail

Letter 1723 (pg 42 plan) actually does make some site specific decisions It decides if there is to be more wilderness candidates and where they are, it decides where special management areas will be, where research natural areas will be, where campgrounds will be, where wild and scenic and recreation rivers will be, where timbering is allowed, There are alot of site specific decisions including how land will be classed as LTA's under the ECS It is very odd that no site specific decision since the 1987 plan was approved has ever had an EIS done on it This seems contrary to NEPA and CEQ regulations sustainability"

Response· The revised FP is a programmatic document that sets direction for implementing the preferred alternative The decisions to be made in this revision can be found in Chapter 1 of the EIS

Letter: 1723 need to define naturally diverse and "long-term sustainability"

Response Natural diversity is best defined through the many elements & criteria in the ECS, sustainability of the FP exceeds 150 years

Issue 13-6 Objectives Preference/dislike/modification

Letter. 1723 (pg 48 #k Plan) you must only allow land use on NF lands that does not degrade the NF lands and maintains ecosystems and their processes

Letter 1723 (Pg 46, Plan) the FS recognizes the importance of riparian areas but does not go far enough There should be no logging of these areas for any purpose

Letter: 1808 Chaper IV, Management Objectives, p 48 We recommend adding the following phrase to statement 3(k), " and when Federally-listed threatened and/or endangered species will continue to be protected according to the Endangered Species Act " We also suggest changing the statement 4(d) to read, "Provide high quality pine and hardwood saw-timber and other forest products " Additionally, we question whether or not it will be feasible to supply a continual flow of high quality pine and hardwood products

Issue: 13-6 Objectives Preference/dislike/modification

Response: Comment noted

Letter: 9 I support this plan with the exception of the lack of detailed descriptions of timber cutting methods

Response· Timber cutting methods are explained in App J of the EIS

Letter: 1723 (pg 52-53 Plan) you do not explain how you derived the downed wood and snag numbers as being sufficient What are they sufficient for? What level of wildlife populations? How do they compare to natural amounts of dead wood?

Response These estimates are not supported by literature & were dropped from the MIS list

Letter: 1723 (pg 46, LRMP) why are only fire dependent LLP and SLP ecosystems emphasized here?

Response: These communities have the most to gain via restoration, all communities will be restored, but not to the levels of LLP & SLP that exceeds 100,000 acres

Letter. 1723 (pg 52-53 Plan) Nodding Nixie is not just a species of the longleaf pine woodlands you do not have populations for all species like Louisiana Black Bear and other species Slender Wakerobins I have seen are not in dry forests but mesic slopes and woodlands Your vegetation group, dry-mesic and xeric oak-pine forests makes no sense Something cannot be dry and mesic at the same time and cannot be xeric and mesic at the same time

Letter· 1723 (pg 52-53 plan) Bobwhite should not be common to all land areas because it is an upland grasslands bird I believe having Fox Squirrels for all lands also does not make sense I believe that Louisiana Waterthrush is a good indicator for interior forest species This bird should be used as an indicator number of other salamanders could be used because they can indicate the impacts that clearcutting is having on forest dwellers all timber activities could be well monitored by using salamanders

Response The MIS table has been changed, many changes reflect your concerns

Issue 13-7 Management areas preference/dislike/modification

Letter· 1604 The Draft EIS at 5 arbitrarily limits the red-cockaded woodpecker (RCW) habitat in (Alternative 6 and 7) 212,824 acres, and then would "leave sub-populations isolated between forested areas that are not managed according to RCW EIS standards RCW populations would expand to recovery levels, but probably not beyond that " In contrast, under Alt 4b the RCW habitat (MA-2) would be 338,637 acres (DEIS 85) "RCW population could expand beyond recovery objectives " This forces us to choose between (a) changing Alt 6, (b) accepting the limits therein to RCW expansion, and (c) explaining away the DEIS premise that management according to EIS/RCW standards is better for RCW

Issue. 13-7 Management areas preference/dislike/modification

Response·

Ten alts were considered in detail in the EIS Any one could be selected as the preferred only if the RF identifies it as the alt that maximizes net public benefits Different individual organizations or agencies place different weights on the importance of providing various uses, values, products, & conditions This fact results in disagreement between these various entities over which alt should be selected as the revised NFGT Plan Our planning effort was driven by making careful balances between alts of all user needs This was done in a sensitive manner to reduce conflict, sustain the environment & yet provide the maximization of net public benefits The RF has identified Alt 8 as the FS preferred alt in the FEIS This alt was developed to respond to a wider array of uses, values, products, & conditions Public comments, national & regional policy, all applicable laws such as ESA, Antiquities Act, Clean Water Act, etc , and the analysis of resource opportunities aid the RF in reaching this decision

Issue: 13-7-1 DFC

Letter: 1723 (pg 16 Summary) I want the driving direction for the grasslands to be restoration to native grassland species I disapprove of your statement on pg 44 DEIS where you say "These pastures of bermuda or lovegrass are managed to complement native prairie land and increase grazing capacity" What you are saying is that you will not manage by ecosystem management If you were you would restore the native tall grass prairied and not cultivate exotics that compete and take over from native grasses

Letter: 1808 Chapter IV, Desired Future Condition, p 45 Language in the DEIS provided for allowing development of oil and gas wells along major travelways To reflect this in this section of the Managment Plan, the statement regarding scenery along major travelways should be revised to read, "Scenery along most of the major travelways, lake shores, and river corridors will develop and maintain a variety of scenic qualities, including some areas with an older-forest character " It is further recommended that a statement in MA-1-62 and MA 2-62 be developed to include that well sites and associated facility locations may be placed in major roadways to reduce forest fragmentation

Response. Comment noted

Letter: 1808 Chapter IV, Plan, Desired Future Condition, p 44 While we agree that examples of natural succession on forest and grassland ecosystems will be demonstrated through more areas that are managed for special attributes, we are concerned that these may become the only areas within which ecosystems management will be implemented The concept of a forestwide ecosystems management plan should be sincerely put into practice

Response: The FS will use ecosystem management as the means to meet goals specified in the revised FP Ecosystem management is the means to an end It is not the end itself The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values. For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Letter: 1723 (pg 44) Loblolly Pine usually occurred on the slopes and bottoms and not in the uplands So why do you want predominantly Loblolly in the uplands Loblolly naturally grew in dense stands so why do you want to manage it as an open forest? areas of potential OG forest need to be identified now so that the public can review your decision on this define what "older forest character" means you try to make wilderness sound unattractive saying it grows up into thickets

Issue: 13-7-1 DFC

Response: Pg 44 describes the DFC for NFGT Loblolly pine is only mentioned in the paragraph that states "Areas of the Forest will generally develop older tree conditions, including bottomland hardwoods, mixed forest uplands and upland pine areas with an open character of longleaf, shortleaf, and loblolly pine stands "

Issue. 13-8 NEPA Process & Procedure

Letter 1723 I am totally against MA-8b-112, where it says that timber can be cut for non-timber goals

Response. Comment noted

Letter: 1723 (pg 139 DEIS) the FS is not taking cumulative effects properly into account either in this EIS or site specific ones You have not done a proper job on cumulative environmental assessment in this DEIS because you have not looked at past, present, and reasonable forseeable future impacts from oil and gas drilling activities You leave out the past and present such activities on both National Forest and private lands that are adjacent or nearby NF lands Such environmental impact assessment is required under CEQ mandatory regulations

Letter 1723 You ignore the cumulative impact that occur when private minerals are on federal forest land the FS does not do any environmental analysis even though NEPA and CEQ regulations do not exempt the FS from doing environmental analysis by not doing any environmental analysis when private mineral rights on federal lands are involved you eliminate the ability of the FS to mitigate the damage you ignore these individual and cumulative impacts and how you can reduce impacts elsewhere to make up for these impacts

Response. It is important to understand that there are two levels of decision making in the FS The FP represents only the first level of decision making about the management of the NFGT Site-specific, project planning to implement the goals and objectives of the FP is the second level of decision making "Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions " (40 CFR 1508 7) Cumulative impacts are among the effects (40 CFR 1508 8) that must be included in considering the environmental consequences of actions (40CFR 1502 16) The "action" represented by a FP is the selection of a programmatic framework to guide future decision making on the forest, using FP management direction as a gateway to compliance with environmental laws at the project and activity level A FP is not an aggregation of 10 to 15 years of individual project decisions The EIS for a FP is, therefore, programmatic in nature Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources " In most cases, this commitment takes place at the specific project/activity decision point Therefore, the EIS for a FP commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the cumulative effects of individual projects/activities that have not yet been scheduled

Letter· 1723 (pg 228 plan) . what guidelines does the Forest have for the determination of clearcutting being the optimum method? You must give these now to guide site specific determinations The same holds true for stand conversions

Response

Under the requirements of NFMA, site-specific analysis and disclosure is needed to support any decision on clearcutting as being "optimum" or other even-aged regeneration methods as being "appropriate" Many of the alternatives limit the use of certain even-aged or uneven-aged regeneration methods where the use of such methods would not achieve the objectives of the management areas within those alternatives

Letter. 1723 I am also concerned that you apparently allow amendments too easily during the project level decisions

Response: Any amendment will follow NEPA procedures

Issue 13-8 NEPA Process & Procedure

Letter: 1723 (pg 16, LRMP) demand is different from need You do not talk about alternatives to cutting, like recycling wood or wood substitution Yet NEPA and CEQ regulations require that even alternatives that are not under FS power need to be assessed and requires that all reasonable be looked at

Response: The CEQ regs require agencies to "Include reasonalbe alternatives not within the jurisdiction of the lead agency" (40 CFR 1502 14 (c)) Various levels of timber harvesting were considered in the alternatives, with annual ASQs ranging from 62 9 MMBF in Alt 6 to 144 5 MMBF in Alt 2 Chapter II of the EIS discusses the alternatives & how they were developed & refined, as well as discussing alternatives that were eliminated from detailed study Obviously, the number of alternatives that could be developed to direct the management of an area as large as the NFGT is infinitely large A range of alternatives was developed to address public comments, issues, & legal requirements

Letter: 1723 (pg 53 DEIS) project by project decisions do not look at cumulative impacts from all past, present, and foreseeable future decisions on FS lands and adjacent private lands Yet this level of environmental analysis is needed if a landscape ecosystem management perspective is to be used

Response: Cumulative impacts of proposed actions & alternatives have been addressed in site specific project EAs As we refine our ecological classification system & ecosystem mgmt procedures, we will be able to better define cumulative impacts of activities on the NFGT

Letter. 1723 problem with site specific environmental analysis is that there has never been, since the 1987 FP was approved, a site specific EIS done on any of the four Texas NFs You must give guidance in the FP when an EIS will be done on a site specific project and cumulative impacts will be looked at in every environmental analysis no matter what the level of analysis

Response: The CEQ regulations provide ample direction for determining when to prepare an EA & when to prepare an EIS (see 40 CFR 1501 3 & 1501 4)

Letter 1723 (pg 8 plan) there is no officially approved plan The 1987 plan was remanded back to be revised and was not approved Therefore, in my view, all decisions that have been tiered to the 1987 FP and DEIS are illegal because the 1987 FP was not approved

Response: The 1987 FLRMP was approved by RF John Alcock on May 20, 1987, as correctly stated in the Revised Plan, chapter II, page 8 The 1987 FLRMP was remanded by the Chief of the FS for re-analysis due to appeals & court orders The Chief's remand letter of April 1, 1989 provided direction for interim mgmt of the NFGT as follows "For those areas within 1,200 meters of active & inactive RCW colonies (approximately one-third of the area of the NF), mgmt will be conducted in accordance with the decision of the Federal District Court & any future court rulings Except as provided below regarding appropriate silvicultural systems, mgmt of the remaining two-thirds of the NFs will be conducted in accordance with the mgmt prescriptions & standards & guidelines contained in the FP approved by the RF on May 20, 1987 "

Letter. 1723 since the 1987 plan .. no cumulative impacts have ever been done for all past, present, and foreseeable future oil and gas and other activities in the forest and no EIS has been done for any activity In addition you do not define "significantly exceed" In other forests EIS's are done when wells are proposed to be drilled Why is this not done in Texas?

Response: Cumulative impacts of proposed actions & alternatives have been addressed in site specific project EAs The EIS Appendix C has an extensive discussion of past, present, & reasonably forseeable development of oil & gas resources Analysis & decision making guidelines for drilling operations are outlined on page 30 of Appendix C, & guidelines for field development are on page 43 of Appendix C The definition of significance is found in the CEQ regs at section 1508 27, & takes into account both the context & intensity of proposed actions Guidance for determining when to do an EA or an EIS is found in the CEQ regs in sections 1501 3 & 1501 4

Letter. 1808 To date, the USFS has not determined the cumulative impacts of past, present, and future oil and gas exploration and developments on the RCW, the rare plant communities, particularly the LL pine/bluestem community, and on the interior forests in each of the NFs in TX In order to be in compliance with the NEPA, it is recommended that these impacts be determined

Issue. 13-8 NEPA Process & Procedure

Response The EIS Appendix C discusses past, present & reasonably forseeable development of oil & gas resources Impacts of oil & gas development proposals will be addressed on a site specific basis A discussion of standard operating procedures for leasable energy minerals is found in EIS Appendix C, pages 33-51 Forest-wide standards & guidelines for mineral resource activities are located in the Revised Plan, Chapter IV, pages 69-71, & include provisions to guide environmental analysis Also, Mgmt Areas 3,4,5,7,8a, 8b, 8c, 8d, 8f, 9a, 9b, 10a, 10b, & 11 have additional standards & guidelines for mineral activities

Letter: 1723 large loophole that means major changes can be made under the guise of site specifics Where is the guidance to districts to ensure that this kind of action does not occur?

Response: Project level decisions must adhere to Plan direction Full review, internal & public review, externally ensure compliance & elimination of perceived loopholes

Issue 13-9 General

Letter. 1723 (pg 48f plan), mimimizing insect and disease loss should not be a goal You should allow insects and disease to play their natural role in the forest

Response: SPB control is given priority in most management areas in order to protect the pine resource which will help provide for multiple use and lead to sustained yield as mandated in the MUSYA SPB control is not given high priority in management areas where natural processes are the main focus, such as wilderness

Letter 1723 (pg 50 plan) I do not like guidelines because they give too much flexibility
Letter: 1723 (pg 51 plan) I feel your management area ecosystems are not sufficiently broken down You need S & G's for each ecotype that you work in down to stand level and even inclusions less than 10 acres in size
Letter 1723 MA-8f-92 - make sure that unprogrammed timber harvest is not allowed also
Letter: 1723 MA-4-111 - I want no timber cutting of any kind for any purpose except for individual hazard trees in imminent danger of falling in an area where the public often is found

Response: Comment noted

Letter: 1723 (pg 49 plan) need to define Ecosystem Management here What do you mean by an "ecological approach to management?" Your discussion of EM does not sound like what came out of the Chief's office three years ago Please explain you views origin and its relationship to what the Chief has said

Response: The FS will use ecosystem management as the means to meet goals specified in the revised FP Ecosystem management is the means to an end It is not the end itself The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Issue: 13-9 General

Letter: 1723 (pg 124) you leave too much to site analysis which never occurs You need standards that spell out that riparian areas are off limits Nothing less is sufficient

Response The purpose of streamside zones is not to set aside and not manage, it is also not to manage for timber Purpose is for management for wildlife and recreation and to protect streams

Letter: 1723 (pg 10, Plan) scenic areas have not been managed to protect their scenic qualities BCSA has been devastated by SPB cutting you have allowed oil and gas drilling in Winters Bayou

Response. The FS can not stop mineral rights owners from drilling to recover their minerals The SPB cutting in BCSA were done to protect the scenic quality of the rest of BCSA

Letter: 1723 seems that the FS is distorting wilderness values and potentials and ignoring the will of Congress and what Congress has said was sufficient for wilderness in the past

Response Wilderness management in Texas has been in accordance with the Wilderness Act of 1964

Letter 1723 (pg 13 DEIS) you state that the ranger districts developed three different strategies There needs to be a summary of what these were and how they differed from each other and what the planning team wanted The public needs to see what the feeling of the FS itself is about this plan

Response: Alternatives 2,3, & 5 were developed by the district

Letter: 1723 (plan pg 85) you ignore the hardwoods on the uplands and have too short rotations You need 200 yrs for Loblolly, 250 yrs for SLP and 300 yrs for LLP and let upland and bottomland hardwoods live as long as possible

Response: The IDT is not aware of any documented research to support this

Letter: 1723 (EIS appendix J), is not even listed in the table of contents

Response: Thank you for bringing this to our attention

Letter: 1723 (pg 48g plan) you do not have a prescribed burning program that mimics natural ecosystem evolution

Response: Lightning fires were only one source of pre-settlement ignition Native american burning is also part of the fire history of these areas The planned burning cycles are part of the overall mgmt intended to produce the DFC's The DFC's provide the diversity required by the NFMA

Letter: 1723 (pg 2 DEIS) maximizing public benefits may not be what you want Can you define this? Is there only one way to maximize public benefits or are there many ways? Which one is best? This is a subjective choice After all many of the benefits cannot be valued in dollars and therefore lose out in a strictly capitalistic totaling of the benefits

Issue 13-9 General

Response: A definition of net public benefits is found in the FS Planning regs at 36 CFR 219 3 "An expression used to signify the overall long-term value to the nation of all outputs & positive effects (benefits) less all associated inputs & negative effects (costs) whether they can be quantitatively valued or not Net public benefits are measured by both quantitative & qualitative criteria rather than a single measure or index The maximization of net public benefits to be derived from mgmt of units of the NFS is consistent with the principles of multiple use & sustained yield The Planning regs require "Mgmt direction shall (1) Include requirements for analysis to determine programs that maximize net public benefits, consistent with locally derived information about production capabilities " (36 CFR 219 4(a)) In section 219 12(f) the planning regs also state that "the primary goal in formulating alternatives, besides complying with NEPA procedures, is to provide an adequate basis for identifying the Alt that comes nearest to maximizing net public benefits, consistent with the resource integration & mgmt requirements of sections 219 23 through 219 27" The EIS App B is an extensive description of the analysis process used to evaluate each of the alts including the basic assumptions, modeling components & inputs, rules, methods, & constraints that were used

Letter: 1723 (pg 49 plan) you do not have ECS completed so how can the public rationally pass judgement on what you will do You in essence rob the public of input by providing no final product and the opportunity to comment on it

Response· ECS is a continually developing & improvement effort as more information is gained, clearer identification of ECS components will be described Numerous state, federal, and university personnel, as well as organizations and individuals have provided information Your input is also welcome

Letter: 1605 The documentation of Roadless Areas is inadequate The EIS does not document the effects of building roads and cutting timber

Response: All roadless proposals are evaluated by a standard set of criteria that has been established by DOI since RARE I

Letter: 1632 *I reject the arguments made in App J that maximum growth rates of pine should be the determinate factor in selection of silvicultural systems* Dendrochronologic studies of virgin pines and the lumber they yielded reveal considerably different growth dynamics than plantation-grown pines

Response. The IDT is unsure what this comments refers to. App J describes the silvicultural systems & their related regeneration methods, & the species requirements of some trees known to occur in TX

Letter: 1632 FS needs to investigate methods of inducing variable growth rates in stands to more closely mimic natural dynamics

Response· We agree, this is presently being researched

Letter 1723 (pg 50 plan) define "equitable balance of resource values "

Response. Equitable is defined as dealing fairly or equally with all concerned by the Webster's Ninth New Collegiate Dictionary

Letter 1723 the DEIS has a glossary but the LRMP does not Is the glossary for the DEIS also applicable for the LRMP? You need to make this clear

Response: This revision follows the customary practice of one glossary for Plan/EIS documents Terminology is consistent between the documents

Letter· 1723 (MA-1-92) cannot simply classify 1000's of acres as suitable for timber production since this violates what any site specific analyses will tell you

Response: Land suitability is a plan decision as explained on page 2 of the Plan

Letter: 1723 (pg 71 DEIS) It also puzzles me why you would have alternatives like 5, 6, and 7 without fire when you have just stated what you did in the paragraph above (referring to grasslands)

Response: Alt 5, 6, & 7 have fire, but it is not emphasized as explained in the last paragraph of the same page

Issue: 13-9 General

Letter: 1763 The FS should make every available effort to educate the public about desired future conditions in its implementation of the preferred alt In addition, attempts should be made to identify and promote other non-traditional, sustainable economic uses

Response. We agree, our Public Affairs Office is working on such a strategy now

Issue. 14 MINERALS

Issue. 14-1 Leasing

Letter: 1409 I have no objection to oil and gas leasing for people to make money It is along the trail (LSHT) I would want the company to do the work of re-routing the trail for use
Letter: 1453 I urge permission given for federal oil and gas leases in all zones but Special Areas, provided that proper limits on surface damages are imposed
Letter. 1636 I favor leasing and doing it in a manner that disrupts other NFGT activities the least
Letter: 1723 MA-5-31 - there must be no mineral exploration and development in Toledo Bend, period
Letter: 1723 Forest Service needs to do a better job regarding its activities on leasing minerals currently the FS allows counties to use gravel, sand, or iron ore for roads that go through or are near NF (pg 137 DEIS) there are sources of such materials that are offsite from the NF's that can be used and the taxpayers are not getting paid while the forest land is being destroyed

Response· Comment noted

Letter 88 No leasing of federal minerals in wilderness, scenic or biologic areas, not within 150 feet of streamside or trail corridors.
Letter: 412 Leasing okay, if minerals (oil & gas) can be produced from outside the corridors
Letter 1626 Limited mineral activity Ideally, I think mineral activity should be prohibited in the National Forests, but I also think all parties involved in this issue have to compromise I am sure there are some areas in the National Forests where mineral activity could take place without harm to the environment

Response. There are two categories of minerals on NFGT US Minerals are federally owned & we can deny lease of these The other class of minerals, known as reserved & outstanding, occur when the FS has the lands, but the party we acquired the land from retained the mineral rights Some stipulations can be placed on the surface occupancy (actual well site, etc) but we cannot deny owners the rights to their minerals

Letter 1566 Selling leases, minerals for below market value violates the trust of the real owners of these resources (the American people) Doing so distorts the market place by giving unfair advantage to those with access to public lands

Response: US minerals are leased using the competitive bid system Monies received go to the treasury with 25% returned to the county

Letter: 1575 recommend that there be no leasing of federally owned oil & gas in wilderness, scenic or biologic areas, and that elsewhere wells be more than 150 feet from streams and trails
Letter: 1622 not have mineral leasing on wilderness and on current as well as proposed special areas such as Research Natural Areas, Botanical Research or sensitive areas as operationally defined by the Texas Natural Heritage Program, RCW management areas, streamside management zones and other special site listed on pages 111, 114-116 of the plan not currently under protective designations
Letter 1679 There should be no leasing of minerals in protected areas

Issue. 14-1 Leasing

Response: Leasing of US minerals in special areas is permitted with no surface occupancy Reserved & outstanding mineral rights will be honored & managed according to FW S&G's In wilderness areas, no new leases will be issued except when a nearby well on private rights is draining oil/gas from adjacent US minerals with no surface occupancy Reserved & outstanding minerals in wilderness will be managed per the S&G's in MA-7 Minerals in MA-4 will be managed according to the S&G's in MA-4

Letter. 1310 Alt 6 should be modified to allow for the leasing of federal minerals, except in wilderness or any type of special area, and with clauses prohibiting occupancy within trail zones and SMZ's

Letter: 1385 The ban on mineral leasing seems to have been put in Alt 6 to arouse the opposition of the oil industry. While leasing should not occur in special areas, it could be carried out elsewhere without permanent roading or excessive clearing No leasing should occur within 150 feet of streams or trails

Response: Alternative 6 is the no lease alternative and we must have this in at least one alternative

Letter: 1723 (MA-4-62) I am totally against selling public minerals in riparian areas Remove "extent practicable"

Response In leasing, there is a mandatory set back from streams, intermittent - 66 ft , perennial - 100 ft

Issue. 14-2 Exploration and Development

Letter: 18 Lateral drilling should be used to protect these areas if nothing else can be done (referring to scenic and botanical areas, and streamside and trail corridors)

Letter 1309 Alt 6, which eliminates leasing land for mineral exploration, would prevent any impacts to cultural resources from oil/gas exploration on FS lands However, since the overall impacts to cultural resources on the NFGT has been relatively minor in the past, eliminating such exploration may be unnecessary Alt 7, which simply decreases land available for leasing may be a more reasonable alt

Letter: 1723 MA-4-63 - no seismic surveys should be done here either

Letter. 1723 (MA-8a-62 and 63) I am totally against any oil and gas or other mineral development in these areas a priority to buy up these rights and retire them so they will never be used

Letter: 1723 (MA-9a-72) I am against the use of any recreation area for any mineral extraction

Letter: 1723 MA-8f-52 - I oppose any disturbance due to minerals

Letter· 1723 MA-4 62 - no public minerals must be leased in streamside zones

Letter. 1765 There is no good reason shown for excluding oil and gas leasing from areas outside the wilderness, scenic or biological study areas and the 75FT protected-corridors along BOTH side of ALL streams and trails.

Response: Comment noted

Letter: 1723 (MA-8c-62 & 63) I oppose any mineral development here A standard is needed which will have a goal of buying up all mineral rights in special management areas

Response· Given sufficient funds, this might be accomplished

Letter: 373 However, I do believe that mineral extraction can and should take place in areas other than riparian zones (SMZ), trails and special use areas

Issue 14-2 Exploration and Development

Response Leasing of US minerals in special areas is permitted with no surface occupancy Reserved & outstanding mineral rights will be honored & managed according to FW S&G's In wilderness areas, no new leases will be issued except when a nearby well on private rights is draining oil/gas from adjacent US minerals with no surface occupancy Reserved & outstanding minerals in wilderness will be managed per the S&G's in MA-7 Minerals in MA-4 will be managed according to the S&G's in MA-4

Letter 454 strip mined area is hardly what I call safe, scenic or enjoyable

Response: There is no strip mining being done on the NFGT

Letter. 1632 Because of widespread development of outstanding minerals, US-owned minerals should not currently be developed that would result in increased surface disturbance Outstanding minerals development should be focused, to the greatest extent possible, on areas previously or recently cleared for ROWs or timber-related activites

Response: The national energy policy provides for environmentally sound development of US minerals We negotiate with outstanding mineral owners to develop in the most environmentally sensitive manner that is reasonable

Letter 1723 (pg 43 DEIS) you show that wells will be drilled but on page 36 you showed none would be Please explain

Response: The EIS has been amended to clarify this

Letter: 1723 (MA-3-42) remove "to the extent practicable" and require compatibility with wildlife management and dispersed recreation goals There is no need to make oil and gas a dominant use which is what you are doing by making wildlife and recreation subservient to drilling activities

Response· Change made to the FP site specific analysis on each individual project

Issue: 14-3 General

Letter: 1723 (MA-8b) no mining must be allowed here
Letter· 1723 (MA-8b-61 and 62) I am against any oil and gas or other mineral extraction in river corridor
Letter. 1723 MA-8f-54 - I support the purchase of the mineral rights
Letter: 1723 (MA-9b-72) no geophones or other mineral uses of these areas
Letter. 1767 I believe that no changes should be made (from alt 1)

Response. Comment noted

Letter: 1175 no mining on public lands without a percentage going to the Government

Response: US minerals are leased using the competitive bid system Monies received go to the treasury with 25% returned to the county

Letter: 1175 No cyanide mining should be allowed to protect water table

Response: Cyanide mining is not used on NFGT

Issue: 14-3 General

Letter: 1808 The "desired future condition" (in approximate number of acres) for each plant community and ecosystem should be determined in order to calculate the number of available acres for future oil and gas activities It appears that the preferred alternative would concentrate mineral leasing on the remainder of the forests We are concerned that this management strategy emphasizes mineral leasing to replace lost timber revenue resulting from RCW management

Response: Acreage estimates for each MA and LTA's within that MA have been added

Letter: 1723 (pg 140 DEIS) saying that the unreclaimed roads and drill pads per year will account for about 1 84 acres/site reason this is biased is because it does not admit that the disturbance that has occurred and is being reclaimed will take 50-70 years for the forest to recover its original structure .pads and roads that are unreclaimed due to production will probably be around for 10-30 years so that means that it will take close to 100 years for these site to be rehabilitated back to the mature forest they were when cut

Response: We use 20 years for the average life of a well After that, it is rehabed & considered to be in some phase of production for multible use

Issue: 15 LANDS

Issue: 15-1 Landownership-Acquisition and Exchange

Letter: 1767 mention is made of the fragmented ownership pattern of USFS land and right-of-way problems that this causes This works both ways because USFS land can be a barrier to private property as well as the reverse A policy of cooperation should be adopted Private property rights should be respected and the intermingling of properties should be no issue Some of the prope-ty has been in family ownership for well over a 100 years

Response: Comment noted

Letter. 1671 Also, in order to manage and burn on an ecosystem scale, it will be important to consolidate management units as much as possible This concept should be taken into consideration when trying to purchase or exchange land for the NF

Response This is long standing policy and is consistent with draft FLRMP as indicated by FW-085 on page 67 of draft FLRMP

Letter: *1679 Private lands should be purchased to make the grasslands more contiguous, especially in the LBJ Grasslands*

Response This is an allowable land adjustment process when funding is available and private landowner is agreeable

Letter. 1723 (pg 125 DEIS) you need to have land ownership adjustment maps in this document so we can see where RCW habitat is and how acquisition could help You traded away good mature pine habitat that was good for RCW for pasturage and younger trees for Bela Keroli This just demonstrates that you can sacrifice good RCW habitat when you want and make an excuse for it

Response: RCW habitat is one factor considered in the land adjustment process Landowner adjustment maps are located at District and Forest Supervisor's offices and serve as depicting a DFC

Letter: 1723 (pg 125 DEIS) the demand for land uses by private interests must take a back seat to resource protection

Issue: 15-1 Landownership-Acquisition and Exchange

Response: By law (NEPA) resource protection is evaluated on all land disposal actions

Letter: 1778 You should greatly expand the acreage of national forests such as to cover the area shown on state maps

Response. Total acres within the NF boundary depicted on state maps is approximately 1,730,937 while only 637,451 acres (37%) is currently administered as NFS lands It is unlikely that support or funding will be available to substantially increase the current 37% situations

Letter· 1808 Issue 15 is very general and could use a better discussion of the USFS's land acquisition goals. It would also be helpful if there were maps or tables describing the location of proposed land acquisitions

Response· The Summary of the Draft EIS is very brief Chapter IV of the draft FLRMP provides more specific goals and objectives This issue is addressed by Forest-wide S&G labeled FW-084--FW-090, found on pages 67-69

Letter: 1310 No rock mining should be permitted in Upland Island Wilderness If it is shown that private claim to any subsurface materials in the wilderness is valid, then the FS should buy out the claim, even if it requires using the power of emminent domain

Response. To accomplish this, there must be appropriated dollars from congress

Letter: 1723 FW-086 - what variances are allowed? I do not approve of variances unless you have some strict guidelines

Response: There are no specific variences

Letter: 1723 FW-089 - what are these variances I am against . special use permits that allow occupation by structural improvements,

Response: FW 89 does not deal with special uses, it deals with exchange & disposal guidelines

Letter: 1723 (pg 68) - you should add acquisition of state listed of TOES listed species habitat In addition the Sierra Club proposal which was submitted in 1991 should also be the basis for deciding which lands to acquire

Response: This is reflected in the listed priorities

Issue: 15-2 Land Uses

Letter: 1644 The Resouce Management Plan that continues to provide the best balance between the public who use these areas for recreational activities and the owners of livestock which graze areas would be the plan that I endorse The use of the grasslands for grazing not only provides pasture spaces but also eliminates the continual build-up of grass and brush which would reduce the usage of this land for recreational purposes

Letter: 1723 (pg 125 DEIS) you absolutely ignore the impacts that military use of NF land can have You must give guidance to the districts about what is and is not acceptable

Response: Comment noted

Letter: 1723 (MA-4-51) .what does compatible mean Be more specific about what is and is not allowed.

Issue: 15-2 Land Uses

Response Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Letter: 1808 Part II(a), Environmental Consequences of the Alternatives, Land Uses, p 126 This section states " valid existing rights may override management objectives " to grant land use authorization permits A statement should be included here to clarify that endangered species' concerns may take precedence over granting some of these land use permits, and example may be when these authorizations involve a "take" of an endangered or threatened species

Response: We have no authority in activities related to reserved or outstanding valid existing rights, we can only recommend management actions for operators

Letter: 1723 (MA-9a-62) do not assume such special use permits will be granted Use the word may and add "if ecosystems are protected and not overused "

Response: The IDT disagrees

Issue: 15-3 Property Boundary Management

Letter 1723 (pg 126, DEIS), what assessment has been made on timber cutting at the boundaries In other words stealing of NF timber?

Response: This is part of the land line & encroachment administration process

Letter: 1723 FW-083 - remove "as feasible"

Response The IDT disagrees

Issue. 15-4 General

Letter. 1723 FW-090 - I want the acquired lands to undergo public review via a plan amendment so the public can review and comment

Response: This standard pertains to the management area classification of lands already acquired

Letter. 1723 (MA-8b-51) define compatible

Response: Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Letter: 1723 (MA-8b-52) remove "where practicable" and "reasonable alternative" not measureable Standards must be measureable

Response: The standard has been changed to reflect your concern

Letter 1723 (MA-8b-53) "significant public benefit" must be defined or removed

Response: Significant public benefit is determined on each land exchange based on site specific information

Issue: 20 PLAN STANDARDS & GUIDELINES

Issue: 20-1 Forest wide

Letter: 1723 (pg 58, DEIS) I favor using pheromones, with no cutting in scenic areas and other sensitive areas not just SPB's that go from wilderness or other areas into the general forest but also SPB from the general forest that goes into wilderness Also, SPB goes from private lands into FS lands you do not talk about this and what you will do when this happens FS is required to do a site specific analysis when proposing cutting in wilderness near private property to see if the landowner is doing all they can to reduce SPB problems but you do not do this

Response Comment noted

Letter: 1723 (FW-077) I am against shortened rotations since you will perpetuate dense pine stands that will be susceptible to SPB and you will prevent OG from occurring and interior forest species thriving No SPB cutting or control should be done in wet soils where timber will be cut

Response: The IDT doesn't understand this comment Rotation ages are as long or longer in this revision than in the 1987 plan

Letter: 1605 FW-022 - A decision to use a non-native species should be accompanied by a detailed plan to convert to native species, instead of a generalized statement to that effect

Response: This standard directs use of native species unless concerns for sedimentation, water quality or other immediate factors dictate the use of desireable non-native species

Letter: 1605 FW-022 - Desirable non-native species available for use need to be defined and included in the plan

Response: See Plan App B for rehabilitation recommendations

Letter: 1605 FW-022 - It should be stressed that non-native plant species are to be used only if no native species are adequate for erosion control
Letter: 1605 FW-022 - An assessment of the need to use non-native species should be done on a case-specific basis instead of on a general basis

Response. The standard states appropriate native plant species The guideline that defines the use of non-natives is site specific cases where native species will not provide adequate soil & water protection

Issue: 20-2 MA1 - Upland Forests

Letter. 1808 MA-1, Standards and Guidelines, Silvicultural Management p 91 The diameter limits listed for scheduled regeneration cuttings are inconsistent with those in the DEIS for the management of the RCW and its habitat on NFs in the Southern Region Smaller diameter limits are acceptable if uneven-aged management is implemented, however, larger diameters are required when irregular shelterwood is used Irregular shelterwood leaves older trees with larger diameters and these trees produce higher quality seed sources Therefore, we recommend the diameter limits be increased to reflect those in the draft RCW EIS

Response: The IDT agrees The final revised plan has been amended to reflect this Diameter limits will be based on a site-specific analysis

Letter: 1723 (MA-1-19) 10 yrs is too long to re-establish vegetation It needs to be 3 yrs at the maximum Otherwise you assure erosion and water pollution and continued fragmentation

Response: Ten years is the maximum allowed under 36 CFR 219 27 (11)

Issue: 20-2 MA1 - Upland Forests

Letter: 1723 (Pg 65, DEIS) analysis says Maximum Timber alternative gives more gray squirrel habitat acreage than the Maximum Wilderness alternative make no sense Since there will be disturbances that mimic Nature and more den trees because trees will be allowed to grow and die in Wilderness, and maximum acorn production will be allowed on more acres because they will not be cut down, and because riparian and bottomland areas that gray squirrels like will be less disturbed in the Maximum Wilderness alternative it makes no sense to say that it has lower gray squirrel acreage than 4 of 6 alternatives

Response: Your assessment is in error Maximum SMZ acres occur in Alt. 6 & 7, however, this does not equate to bottomland hardwood acres as described in the IES Alts also are evaluated on a combination of species, not a single species such as the gray squirrel Habitat for all small game species evaluated is in fact higher in Alt 2 than 6 or 7

Issue: 20-3 MA2 - RCW

Letter: 1808 It is, therefore, recommended that a standard be included in MA-2 which allows for reconsideration of the location of RCW recovery population in east Texas

Response: This can be discussed during consultation with USFWS

Letter: 1723 MA-2-19 - 10 years is too long to revegatate a road. The standard should be 2-3 years

Response: Ten years is the maximum allowed under 36 CFR 219 27 (11)

Letter: 1808 MA-1, Standards and Guidelines, Facilities, p 100 We recommend changing the statement in MA-2-16 to include language for forest fragmentation, i e , "Restrictions may be implemented in response to resource programs, such as wildlife, forest fragmentation, recreation, "

Response: Changes have been made in the Plan and EIS to discuss concerns regarding fragmentation

Issue: 20-4 MA3 - Grasslands

Issue: 20-5 MA4 - SMZ's

Letter: 1632 MA-4-42 - Pesticides should not be used within MA-4 Substantial limits, free of loopholes (as in MA-4-42) should be set to assure MA-4 is not degraded by continuing timber harvests or cuts Behaviorial chemicals should be used without cutting if action becomes necessary

Response: Comment noted

Letter: 1632 MA-4-41 - suggests that MA-4 would in fact be subjected to the same insect control criteria as MA-1 and MA-2 I recommend no cutting of SPB infestation within MA-4 since harvesting jeopardizes SMZ integrity as discussed previously Uncut trees provide the benefit of organic matter, snags, cavities, and downed woody material for skunks, salamanders, and food chain insects

Issue· 20-5 MA4 - SMZ's

Response: SPB infestations will normally be allowed to run their natural course, unless a site-specific analysis indicates one of the conditions listed in FW-4-42 exists

Issue 20-6 MA5 - Acquatics

Issue 20-7 MA7 - Wilderness

Letter: 1723 (MA-7-12) the only fish control projects I support is to protect endangered or threatened species or to remove exotic or species that do not occur in that area naturally
Letter: 1723 I am totally against any wildlife habitat improvement for aquatic resources unless it is linked to restoration of natural processes or ecosystems that cannot restore themselves (MA-7-13)
Letter: 1723 (MA-7-33) I am totally against any kind of fuel reduction done just to reduce fuel
Letter: 1723 (MA-7-45) I am against control of SPB in wilderness area
Letter. 1723 I am totally opposed to MA-7-48, which allows logging of wilderness areas Cut and remove is not compatible with wilderness values or the wilderness act's need for the minimum tool use
Letter: 1723 I favor a S&G which acquires all mineral rights that the government does not own in wilderness areas Why not favor this maximum protection alternative and provide it as an option for a S&G?
Letter: 1723 (MA-7-93) am not necessarily in favor of designated campsites for outfitters I also am not in favor of horse use in the wilderness
Letter: 1723 (MA-7-98) I fully support that the activities that least alter wilderness and are most dependent on wilderness must be protected
Letter: 1723 (MA-7-101) I fully support the primitive travel and communications requirement

Response. Comment noted

Letter: 1723 (MA-7-11) natural native aquatic resources need to be defined
Letter: 1723 (MA-7-161) define natural native species Wildlife does not need active managing in wilderness

Response: This standard has been clarified in the final document

Letter· 1723 The S&Gs do not address air quality (MA-7-03) in terms of air monitoring that needs to be done near wilderness There is no standard for interacting with EPA and TNRCC on a regular basis to ensure that all wildernesses are not being harmfully impacted by air pollution

Response. FW guidance has clarified all air quality standards

Letter: 1723 (MA-7-47) the FS is not currently really doing a site specific analysis of the adjacent landowner's property When do you say no to a landowner, that they are not managing their land to reduce SPB?

Response: A site-specific analysis of adjacent landowners' property is always done prior to SPB treatment in wilderness

Letter. 1723 (MA-7-71) define "significant disturbance to the surface." What does this mean and how will this be implemented?

Issue: 20-7 MA7 - Wilderness

Response: Significant is defined by the Webster's 9th New Collegiate Dictionary as "having or likely to have influence or effect" A determination of significant disturbance will be made on a site specific basis

Issue: 20-8 MA8 - Special Mgt Areas

Issue: 20-8-1 RNA

Issue: 20-8-2 Candidate W&S River

Issue: 20-8-3 Senic Areas

Letter. 1723 MA-8d-62, MA-8f-54, and page 195 Lake Fannin Organizational Camp, and page 197 Attoyac Bayou Ayish Bayou and Cochino Bayou Archeological Areas, and page 198 Old Aldridge Sawmill and Mill Town, all of these areas should not be drilled, should not have seismic surveys, and should have any private mineral rights bought

Letter. 1723 MA-8c-B2 - no mountain bikes or horses should be allowed in Winters Bayou Scenic Area

Response: Comment noted

Issue: 20-8-4 Botanical Areas

Issue: 20-8-5 Riparian/WL Areas

Letter: 1655 MA-8d-03 - Grazing permits should be phased out completely Grazing constitutes an introduction of an exotic species

Response. Comment noted

Issue: 20-8-6 Archeological/Historical

Issue: 20-9 MA9 - Recreation

Issue: 20-9-1 Developed Recreation Sites

Issue: 20-9-2 Semi-Primitive Recreation Site

Issue 20-10 MA10 - Adm & Special Uses

Issue: 20-10-1 Adm Use Sites

Letter: 1723 (MA-10a-02) environmental impacts and floodplain impacts must also be looked at here
Letter: 1723 (MA-10a-15) require that composting and incineration toilets are used instead of septic systems
Letter: 1723 (MA-10a-23) fire towers will be used for wildlife viewing, forest appreciation, and scenic beauty
Letter: 1723 (MA-10a-41 and 42) I am against the use of pesticides unless it is for specific targeted areas
Letter: 1723 (MA-10a-101) no unprogrammed timber harvest must be permitted either Only imminent danger hazard trees can be cut
Letter: 1723 (MA-10a-103) is duplicative with 101 and must be elimated
Letter: 1723 You need to require energy conservation and alternative energy use in designs and modifications and renovations

Response: Comment noted

Issue: 20-10-2 Special Use Permit Areas

Letter: 1723 (MA-10b-21-24) I am opposed to the use of herbicides and pesticides
Letter: 1723
(MA-10b-33) I agree that ROW need to be consolidated and this must be a requirement and not just encouraged
Letter: 1723 (MA-10b-34&35) I agree
Letter 1723 (MA-10b-37) I support the exclusion of landfills but also you must put gravel pits on this list
Letter: 1723 (MA-10b-38) I object to the exceptions Only one access road is needed for each private property surrounded by NF
Letter: 1723 (MA-10b-72) remove "where needed" and require this
Letter: 1723 (MA-10b-101) I want no programmed or unregulated timber harvest Define "unreasonably interfere "

Response. Comment noted

Issue: 20-10-2 Special Use Permit Areas

Letter· 1723 (MA-10b-42) define compatible and remove "as appropriate".

Response· Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Issue: 20-11 SFA Exp Forest

Letter: 1723 you need a VQO assigned overall to this forest I suggest semi-primitive nonmotorized
Letter: 1723 (MA-11-02-05) I want no mineral development of the area and no cutting of bottomlands

Response: Comment noted

Issue: 20-12 M & E

Letter: 1723 (pg 236) objectives are too weak and not detailed enough or show what monitoring results will actually cause a change to occur In fact the entire table 1 for Monitoring Questions is this way, too broad and not specific for quantification of what monitoring results you want
Letter: 1723 The S & Gs are too weak and often are not measureable in both a quantitative and qualitative fashion If you have a standard it must be measureable and many so-called standards are not measureable
Letter. 1723 you are not able to sample quantitatively to show what is happening with your present system and therefore you have a monitoring system that is not measurable
Letter 1723 (pg 235 plan) you also need to train the interested public to identify sensitive species
Letter 1723 Obj 3b cost efficiency must not be the sole criteria Environmental protection must be the sole deciding factor
Letter 1723 Obj 3k land use authorizations should only be issued if they are compatible with environmental protection and ecosystem evolution and continuity
Letter 1723 (pg 242) your snags/acre numbers are too low
Letter 1723 (Obj 1c) wilderness management needs to take into account that we need to allow evolution to occur and we are simply caretakers and not active managers of the area
Letter 1723 I have looked throughout this document and I see no real better monitoring effort than is mentioned on p 6 of the DEIS [indiscriminant shooting]

Response. Comment noted

Letter: 1723 Obj 4d are the plan estimates too damaging for the forest?

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter 1723 Obj 4f do you want to minimize losses? Is this realistic? Will this reflect a real decrease in susceptibility or just that you have cut down all the old trees Nongame species need to be monitored for impacts here since we know that sensitive species like Trillium can be negatively impacted

Issue: 20-12 M & E

Response: Yes, we plan to minimize losses through hazard reduction and prompt control of infestations This will not be solely through cutting down all old trees, as rotation ages have increased in many areas. The actual decrease in susceptibility will be influenced by the management S&G developed to reach a DFC in each MA

Letter: 1723 You . do not protect the forest "significantly" because you do not have a monitoring program that will qualitatively and quantitatively determine ORV impacts Your monitoring program is woefully lacking yet you want to build more trails and encourage more use when present trails are already not up to standards

Response: The FP proposes to manage ORV use on designated trails in order to reduce and minimize resource damage. Managed trails will provide better resource protection.

Letter: 1723 (pg 182 DEIS) it is not acceptable to justify allowing more ORV use because available use areas is scarce for this activity.

Response. ORVs have been identified as a legitimate use of the NF. It is definitely a recreational pursuit. Our intention is to manage ORVs, to minimize resource damage

Letter 1723 Obj 4a how do you measure if long-term loss of future productivity of the land is occurring

Response: Through a long-term monitoring program

Letter: 1723 Obj 3e how do you tell if ROW achieves better forest managment and more efficient management of public lands?
Letter: 1723 Obj 3c how do you tell if landownership adjustments are "improving management and consolidation"? What are you measuring here?

Response: Some units of measure include reductions in landline miles and corner monuments to maintain

Letter: 1723 Obj 2c. it is not just openings that you need but also you need to say that certain places have not been cut and do not cause ugliness

Response: Variety is the objective, without causing ugliness

Letter. 1723 Obj 4e it is not demand that should drive grazing, but ecosystem function What is sustainable grazing?

Response: Grazing is regulated by carrying capacity on each allotment, balancing against all needs such as wildlife needs

Letter: 1723 You also need a notebook with a picture of each species so people can identify them in the field Your questions are too general. You need to determine population levels Not just indicator species but all threatened, endangered, sensitive, unique species and plant communities plus species like interior forest species and neotropical migrants that are declining

Response Time and resources prevent 100% inventories The MI program provides a logical process to monitor a wide range of related species.

Letter: 1723 Obj 2f what is sufficient levels of law enforcement? What are not?
Letter: 1723 (pg 237) what are sufficient levels for law enforcement? What deficient do you have now?

Response: Sufficient law enforcement keeps within the budget, provides education and presence and is a strong deterrent. Anything less than that is not sufficient law enforcement

Letter: 1723 Obj 1d where are the soil erosion standards, etc ? You need numbers here You need to quantify

Response: Erosion and sediment outputs are discussed in the DEIS

Issue: 20-12 M & E

Letter: 1723 Obj 5a are all streams being monitored?

Response: All streams are not monitored We have streams on each Forest where baseline water quality data is collected

Letter: 1723 Obj 5d how will you tell if ozone is impacting forest vegetation?

Response: See EIS Chap III, part IIa for discussion on Ozone concerns and documentation information SFAU is conducting ozone research studies at the FS Experiment Station *Data will be used from these studies Also, the Forest has conducted ozone studies on the Sam Houston National Forest*

Letter 1723 Obj 1f it is not just if target species are using corridors but are they thriving and viable populations How much cutting is done? What are the effects of disturbance on riparian areas?

Response: S&G are designed to protect the value of riparian areas

Letter 1723 Obj 1g should go under Obj 1e You need to restore the natural frequency, intensity, seasonality, timing, and regime of fire But this is not an objective

Response: Lightning fires were only one source of pre-settlement ignition Native american burning is also part of the fire history of these areas The planned burning cycles are part of the overall mgmt intended to produce the DFC's The DFC's provide the diversity required by the NFMA

Letter 1723 Obj 4g does prescribed burning provide the frequency, regime, intensity, seasonality, and timing characterizing a return to natural ecosystem functioning?

Response: *Ecosystem mgmt does not mean that all mgmt activities must mimic that which would occur "naturally" The prescribed burning cycles are consistent* with these fire allocated ecosystems & will help meet the DFC

Letter: 1632 My experience and comments reflect insufficient/inaccurate monitoring and evaluation of NF management activities (plan pg 231) Too often projects are finished and forgotten with little thought of the possibility of ongoing impacts I have seen cases where erosion control proved inadequate and within one year of closing sale, massive erosion and stream siltation were occurring It was only though my notification that the FS became aware of the problem and was able to take corrective action

Response: Continual monitoring is a constant effort to ensure quality control As identified in Chapter V, assistance through many sources, especially the public & individuals, is appreciated

Letter: 1723 Obj 1e *why are you emphasizing only fire dependent ecosystems?* How is significant and restored defined here?

Response: Objective recognizes all systems, an emphasis is placed on fire dependent ecosystems due to high proportion of T&E species that require this habitat

Letter: 1723 (pg 231 plan) how do you address via monitoring how effectively public concerns are being addressed? What mechanism are you using to get constant feedback on plan implementation I do not see the role the public plays in the monitoring and evaluation program

Response. Objective 3h encourages the association with the public in general for all activities

Letter 1723 (pg 233 plan) It bothers [me] on page 223 that "Not every goal, objective, or standard and guidelines can be monitored at every level " This does need to be done You also need to prioritize your monitoring efforts based on the impact that an activity or use will have on the environment I do not *see that type of prioritization committed to here Why not?*

Response: The M&E process will be continually improved based on annual activities Table 1 sets the questions in place which will allow better prioritization & identification of monitoring actions

Issue 20-12 M & E

Letter: 1723 Obj 2d trails What is unacceptable damage to resources or conflicts with other users?

Response: Unacceptable damage occurrs when S&Gs, State BMPs or other resource mitigation measures are unsuccessful Conflicts are readily observed through public concern & intensity

Letter: 1723 Obj 3a what are "positive characteristics of sustainability" What "ecosystem elements" are you talking about?

Response: Positive indicators of ecosystem sustainability include improvements in the basic biological, physical and social elements within an ecosystem Longterm improvements in water quality or soil productivity are examples

Letter: 1723 Obj 3h how many volunteer/partnerships do you want? What is your number goal here?

Response: The USFS is continually expanding partnerships & cooperative activities No number has been targeted for a successful program

Letter: 1723 Obj 4c what is the desired ecosystem diversity? You only talk about even age stands Why do you ignore uneven age stands? What is sound forest health and diversity? A definition is needed here

Response: Uneven-aged stands are addressed in 4c(1)

Letter: 1723 (pg 241-242) everywhere you have Element Occurrence Record, this is not good enough This does not tell how the species population is doing Is it viable Also you need to know the locations of all the populations and this will not necessarily get you there When do you stop monitoring? When you have one EOR, two, or how many?

Letter: 1723 (pg 241) under the LL-bluestem series it is just not acres that are important but the quality of the habitat How will you measure that? Large LLP, the amount of bunch grass and the extent geographically of populations are things you must take into account You also need to know the number of individuals in populations I also feel that the Slender Wakerobin is a Mesic species but you have it under Dry-Mesic & Xeric Oak-Pine Forests Further you do not take into account that if you manage all of SHNF for the RCW you will end up destroying Wakerobin habitat by cutting for RCW and SPB But these kinds of distinctions do not show up on your chart Also under LA Black Bear, you need a goal of the number of individuals that you will reintroduce and the population you want The acres of habitat mean nothing (much is there right now) without bears reintroduced) The same goes for Red wolves which you totally ignore

Response:
The Mgmt Indicators Table has been revised to address your concern

Letter: 1723 (pg 123 DEIS) you admit you have no air monitoring in the grasslands and you propose to do none There are zero air monitors in the grasslands so to say that monitoring indicates that air quality over the National Grasslands meet the NAAQS is untrue How can we tell what effects ozone or acid rain has if there is no plan to do monitoring

Letter: 1723 acid rain network for monitoring is woefully inadequate and the FS needs to do some acid rain monitoring You also need visibility monitoring to see if the Houston airshed is reducing NF visibility in Sam Houston NF

Response. The M&E table has been revised to reflect your comment.

Letter: 1723 Obj 5c you need to look specifically at erosion that is due to ORV use and logging

Response· Erosion & sedementation concerns are being addressed in ongoing monitoring actions for both ORV & timber harvest activities

Letter: 1723 (pg 83 Plan) it is ridiculous that you allow ORV use when you have no local studies that document the effects of noise, disturbance and other effects on wildlife by ORV's You must put together a research plan that looks at monitoring and research of ORV impacts and how to mitigate these or whether these can be mitigated

Issue: 20-12 M & E

Letter: 1723 (pg 120 DEIS) you state the "The Forest ORV Plan . " but there is no monitoring program proposed that will tell you if nonpoint source water pollution is in fact occurring due to ORV use

Response: See Plan App E, ORV Mgmt The emphasis placed on inventory, evaluation and mgmt, to include closures of ORV trails will be a high priority in the new Plan Monitoring and investigation will be a key component of this effort

Letter: 1723 (Obj 31,pg 239) How will you tell if recreation is having a positive or negative benefit on rural economics and how will you tell how many jobs are created?

Response: Close cooperation with extension programs rural development activities and local communities provide valuable information & reports to guage success

Letter: 1723 MA-2-41 - how will you monitor wildlife and cattle competition for browse and herbaceous plants?

Response: See Plan App G

Letter: 1723 (Obj 4b) How will you determine if huntable populations are not detrimental to nongame species? What does viable mean here and where will you get those figures?

Response· M&E activities & public concern will identify changes in non-game populations The term viable has been removed from the final plan

Issue: 20-13 General

Letter 1723 (pg 45 Plan) you talk about having more partnerships, communication, and cooperation with local communities What about the rest of the interested public?

Response: The USFS is continually expanding partnerships & cooperative activities No number has been targeted for a successful program

Letter: 1723 (pg 47, LRMP) it is needs and not demands that must be met Needs are survial requirements while demands are what you would like to have but do not necessarily need to live

Response. You're right That is part of the criteria for evaluation Everyone makes demands & that certainly doesn't mean they are needed It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

Issue· 30-1 EIS Appendix A

Letter: 1723 (pg 6) your screening eliminated alternatives that you may not have been able to implement but which others could implement Yet CEQ regulations require you to look at such alternatives and not use the excuse that you cannot implement them as a way to avoid doing alternative analysis

Response· While this comment references page 6 of EIS Appendix A, which discusses the process used to identify issues, it refers to screening alts Step 4 of the issue identification process discusses the criteria used to screen substantive comments This is a different process from the one used to develop alternatives, which is described in the EIS, chapter II, pages 12-14

Letter: 1723 (pg 6) in my view personnel is also a germane issue since the plan cannot be implemented without an adequate number of a certain type of personnel from certain disciplines What will reduced budgets do to your being able to hire enough people with the right qualifications to do the job you say you must do?

Issue: 30-1 EIS Appendix A

Response: Personnel matters are outside the scope of FP Land & Resource Mgmt Plans guide all natural resource mgmt activities & establish mgmt S&Gs for NFS lands Since matters such as personnel & annual budget opportunities are not controlled by the Forest, they were eliminated from consideration as significant issues to be considered in the planning process

Letter: 1723 (pg 7) many project level decisions contain decisions that need Forest level mandate but do not have them For instance cutting in riparian areas for other than timber purposes Also residual damage standards are needed since the project level never seems to implement any and trees left after cutting for any reason are unnecessarily destroyed or damaged We need stricter controls or districts get sloppy You also need to audit your districts to ensure they do the right thing

Response: Project level decisions must tier to the FLRMP or else the FLRMP must be amended to allow for the decision The regulations that specify FLRMP amendment procedures are located in 36 CFR 219 10 The comment appears to cite an example of a mgmt practice (timber cutting in riparian areas) that was not allowed or provided for in the 1987 FLRMP However, timber cutting in riparian areas was allowed under certain conditions outlined on pages IV-87 through IV-89. S&Gs for the treatment and/or protection of residual vegetation are found in the Revised Plan, chapter IV, pages 75-79, & in the individual Mgmt Area descriptions for MA1 (page 91), MA2 (pages 103-107), MA4 (pages 129-130), MA7 (page 143), MA8c (page 169), MA8f (page 194), and MA10b (pages 218-219, 221) Procedures for monitoring FLRMP implementation are outlined in the Revised Plan, chapter V Monitoring & Evaluation Reports will be done at least annually & will be available for public review

Letter. 1723 (pg 6) FS must respond to needs, not demands Demands are not necessary Needs are

Response: You're right That is part of the criteria for evaluation Everyone makes demands & that certainly doesn't mean they are needed It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

Issue 30-2 EIS Appendix B

Letter: 1723 (pg 37). I do not agree that dispersed recreation is compatible with timber management activities cannot hide the destruction you do to dispersed recreation with even-age timber activities

Letter: 1723 (pg 29, DEIS) the mixed forests are not even close to being identical in terms of developing standards In addition why do you have so much fire in these mixed systems

Response: Comment noted

Letter: 1723 (pg 44) it is important to note that forest industry lands have been overcut I object to this subsidized private abuse on my public NF lands The NF lands get the environmental abuse because industry has environmentally abused its lands

Response· See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter: 1723 (pg 9 15) it is not clear if you included SPB, salvage, sanitation cuts in the model . you need to give the public some idea about the limitations and problems the FORPLAN model has so they can understand better its ability to give good answers

Issue: 30-2 EIS Appendix B

Response. Per CFR 219 3, the ASQ is defined as "the quantity of timber that may be sold from the area of suitable land covered by the forest plan for a time period specified by the plan " " Within the planning period, the volume of timber to be sold in any one year may exceed the average annual ASQ so long as the total amount sold for the planning period does not exceed the ASQ Nothing in this paragraph prohibits salvage or sanitation harvesting of timber stands which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent danger of insect or disease attack and where such harvests are consistent with silvicultural and environmental standards Such timber may either substitute for timber that would otherwise be sold under the plan or, if not feasible, be sold over and above the planned volume " (CFR 219,27 (c) (2),) However, the NFGT has historically substituted salvage timber for green timber The ASQ identified in the FP was calculated on Lands Suitable for Timber Production only and therefore does not include any volume removed from lands such as special areas and SMZ's

Letter. 1723 (pg 61) you say that Alt 6 is the maximum wilderness benchmark legally allowable there is no legal allowable for wilderness If Congress wants to it can designate an entire NF as wilderness So this is as artificial a restraint as anything

Response. Agreed The constraint was not on the number of wilderness acres, but on the number of acres needed to meet other constraints such as threatened and endangered RCW that needs land to be managed in a different way than those set aside for wilderness

Letter: 1723 (pg 59) 95% of culmination of mean annual increment of timber volume growth is a logging constraint and not a biological one This biases the FS against old growth and does not allow real OG to occur with your favored proposal

Response. See Glossary of DEIS for description of CMAI See previous table for actual age of existing timber at harvest

Letter. 1723 why are you even looking at such low rotations of 40-60 yrs when you know they do not have a chance biologically, politically of making it and are the antithesis of ecosystem management?

Response: The direction is to analyze a wide range of alternatives and what the effects and impacts will be Then to select a preferred alternative that would provide for needs presented in the issues and sub-issues along with the RPA philosophy Non-valued items such as politically acceptable are considered by the Forest Supervisor and the Regional Forester in selecting the final alternative but is not modeled other than possible side boards in feasibility of alternative analyzed

Letter: 1723 (pg 16) FORPLAN Version II is a economic model and it does not give credence to ecological values which cannot be expressed in dollar terms Maximizing PNV is an economic criteria and is not an ecological one assumptions made often are subjective goods oriented and not quality oriented Mistakes can occur information is not ground truthed before it is used in FORPLAN

Response The FORPLAN model is a useful tool to aid the FS to understand the nature of Forest planning problems (not the optimal answer) Its major purpose was to provide insight into the behavior of multiple resources and their interactions, which in turn were used to guide the development of effective plans and decisions The model is used more appropriately to prevent wrong decisions, that which is prescribed by each resource is not in conflict and can be implemented The FORPLAN model is simply a tool to be used with other tools in preparing implementable Forest plans

Letter: 1723 (pg 9) how accurate were the 1987 projections for all different output levels of all different services? Why were there differences?

Response: Annual Monitoring and Evaluation reports have been prepared and results were included in reports to the public and in preparation of the AMS See these documents Major reasons for differences were the RCW ruling and lack of funding

Letter: 1723 (pg 2,3) what % error do the FORPLAN models and other models you use have? it must be remembered that the AMS stopped collecting data, in most cases, in 1990 Alot has happened on the ground since then to not make it the very best analyses you have

Response: See previous comment for purpose of FORPLAN comment noted We agree things are changing

Issue 30-2 EIS Appendix B

Letter. 1632 does an adequate job of detailing the complexity of factors affecting the timber economy, but it ultimately focuses the discussion of economic impacts of the alts on deviations in job numbers based on a limited number of factors I must stress that the linear relationship between timber outputs and jobs is an inaccurate reflection of actual conditions Additionally, other factors related to economics, modernization and supply/demand are so influential to the big picture, that the job fluctuation figures used by the FS cannot be used to accurately depict the real-life situation

Response: The local economic effects of forest resource management policies will vary depending on the structure of a community's economy and it's diversity A community that relies heavily on the forest products industry will be affected by timber management planning, whereas a community that depends on recreation and tourism will be affected by recreational resource management Diversified communities will be less affected by changes than a community which depends largely on one resource The economy of East Texas is based on natural resources including wood, petroleum, and coal The manufacturing of products from the timber growth in Texas forests is a vital part of Texas economy, as well as the regional and national economy Twelve of the deep East Texas counties comprise the most timber dependent region in the state Primary processing operations for southern pine lumber, veneer, and plywood are concentrated in eastern Texas See the Social-Economic Overview Document prepared by Catherine Albers, December 1990, section 8, pages 158-235 Now these jobs that are associated with our timber harvesting may be able to be filled by competing timber ownership if the FS reduces supply

Letter: 1723 (pg 2) the FS has not dealt with the stewardship issue well . the FS said it would pursue National Trail Status for the entire Lone Star Hiking Trail and then in the early 1980's dropped any effort to do this without being honest and saying it would pursue this effort FS must resolve and propose actions to move forward on trail designation in this management plan and EIS

Response In the Sam Houston Land Management Plan, Dec 1978, page 87, we did state we would pursue National Trail Status During the process it was determined that the portions that crossed private land would have to be acquired. The cost of acquiring forced the dropping of pursuit of National Trail Status The recreation program nationwide has a large (more than $1 billion) infrastructure backlog in recreation facilities, trail maintenance and reconstruction, and recreation related roads and bridges This backlog is continuing to grow At the same time, recreation use on NF continues to increase Therefore in the FLRMP of 1987, it was determined to manage the Lone Star Hiking Trail with the standards of maintenance and buffers on a National Recreation Trail on forest land but not pursue acquiring those acres of off forest lands

Letter· 1723 (pg 68,71) again you use a timber not ecological or biological constraint by being at or above the CMAI This is not necessary for this plan or model you limit uneven age management which does not have to be done since you can manage for mixed stands with this management system Ecosystem Management should not allow unnecessary constraints like these

Response: This constraint keeps the model from harvesting before CMAI as required by 36 CFR 219 16 (a) (2) (iii)

Letter: 1723 (pg 27-30, DEIS) rotations that you tried are a travesty Why did you try rotations that obviously are not biologically or ecologically sound? To try 40-70 yr rotations when these are not possible makes no sense

Response. CMAI for southern pine in TX is approximately 30-35 years Forty years was used for the benchmark constraint to determine what would be biologically possible

Letter: 1723 (pg 38) You cannot bring the habitat needs of squirrels down to just one thing You are oversimplifying for the model too much It is also disturbing that there are no road density limits in the FP At the very least you should try different road densities

Response: Appendix B describes the coeffieients & process of their use in the FORPLAN model The process record & information used in the development of each coefficient is extensive & is comprised of many factors

Issue: 30-3 EIS Appendix C

Issue: 30-3 EIS Appendix C

Letter: 1723 does not fully discuss the problems with oil and gas drilling in the NF and grasslands On pages 11-12, it is not just the Sabine but also the Angelina, Davy Crockett, and Sam Houston NF's that have had cumulative impacts occur but have had these ignored in the EA's the FS sometimes does

Response· Comment noted

Letter 1723 (pg 34), you need additional stipulations The FS's policy seems to be that people have to prove drilling should not go in instead of the leasee proving that they need to drill you give an overriding preference over all other activities This is not allowed under multiple use and sustained yield legislation

Response: The FS views exploration, development, & production of mineral resources as part of our ecosystem mgmt responsibility There is no preference to minerals, but coordination with other resources, part of multiple use does pertain to minerals

Letter· 1723 (pg 35), you cut the public out of leasing because no NEPA documents are developed to tell about what the committed resources and impacts will be if the leasing occurs There is no chance for the public to give input

Response: NEPA for leasing is included in the FP, which includes public comment Site-specific NEPA is done at the time of drilling for well site location & mitigation measures

Letter: 1723 (pg 37), you use the figure 0 1 mile but on page 30 you use the figure of 3 miles Which is correct?

Response: On page 30 - 3 horizonal drilled locations Page 37 is 1 average for all drilled sites

Letter: 1723 (pg 38), you say vertical well pads will be 3 5 acres but on pages 30 and 32 you say 1 5 acres Which is it?

Response· Vertical well pads can range up to 3 5, but average 1 5 acres

Letter: 1723 (pg 39), by the time the notice of APD occurs it is too late to stop the well The only option is where to drill

Response Correct Decision to make available to drill is made at leasing time

Letter: 1723 (pg 41), the NEPA process is too late in the process since the lease has already occurred and the decision to allow drilling or not is already made

Response NEPA, to drill is covered with the FP Site-specific NEPA is done at time of drilling

Letter: 1723 (pg 26-28) you ignore the fragmentation effects of the past and present drilling

Response· The Revised EIS reflects your concerns

Letter: 1723 (pg 29) you try to minimize the impacts by saying that overall negative environmental effects will be minimal

Response: Cumulative impacts are currently addressed in the Revised EIS

Letter: 1723 (pg 30) your figure of 1 5 acres for the pad for vertically drilled wells seems very low to me In the past in the NF the pads have been on the order of 2 5-4 acres in size You are trying to minimize the impacts by estimating pad size so low

Issue: 30-3 EIS Appendix C

Response: These are valid estimates based on actual sites on NFGT

Letter: 1723 (pg 31), there are no beneficial environmental impacts when you drill a well Please list all the positive environmental impacts that drilling a well has in a mature forest stand

Response: Openings of the kind & variety developed for drill pads have been used for species such as Eastern Wild Turkey

Issue: 30-4 EIS Appendix D

Letter: 1723 we are the western most extent of the Eastern Deciduous Forest It is important that we keep the evolution of eastern species at their geographical range extent intact with wilderness This is called site specific variances and is not a negative as you imply
Letter: 1723 Big Creek-- support the designation of all 6767 acres of Big Creek as a Wilderness Area
Letter: 1723 Big Slough--I support the addition of the full 1138 acres to Big Slough Wilderness Area
Letter: 1723 Boggy Creek--the FS has pushed to lease for oil and gas all potential wilderness areas wilderness study was biased for hunting since it was done during the hunting season
Letter: 1723 Chambers Ferry--the 95% harvested area is deceiving most cuts have been thinning
Letter: 1723 Harmon Creek--undergrowth is not bad for wilderness
Letter: 1723 Little Lake Creek--I support including the 691 acres I do not support horseback riding in this wilderness .
Letter: 1723 Longleaf Ridge--the Sierra Club does not support wilderness designations for this area, a National Conservation and Recreation Area makes more sense.
Letter: 1723 Stark Tract--you are being subjective here
Letter: 1723 Turkey Hill--I support the 152 acre addition
Letter: 1723 Winters Bayou--there are sensitive species there are still opportunities for solitude and serenity and quiet this is no place for horses
Letter: 1723 (pg 108, DEIS) I am opposed to you leaving out the West and East Forks of the San Jacinto River, Caney Creek, Little Lake Creek, and Big Creek

Response: Comment noted

Letter: 1604 The DEIS includes some pros and cons as to why each Roadless Area might be wilderness, but not as to why each area should be a special area In the alternative as to each, designate it as one or the other category of special area

Response: Proposed special areas & developed roadless areas were proposed separately, except those proposed special areas that were formally proposed in RARE II

Letter: 1723 you continually do not address how to make wilderness proposals acceptable or compatible with Congressional intent You simply disqualify without a good analysis of how such proposals could be made to be acceptable for wilderness Your analysis therefore is incomplete and not acceptable

Response: All roadless proposals are evaluated by a standard set of criteria that has been established by DOI since RARE I

Letter: 1723 On page 3, it is not demands you should talk about but needs How much wilderness do we need Demands are wishes that should not necesssarily be met

Response. You're right. That is part of the criteria for evaluation. Everyone makes demands & that certainly doesn't mean they are needed. It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

Issue: 30-4 EIS Appendix D

Letter: 1723 On page 4 a big deal about NF wilderness areas duplicating other existing wilderness areas Congress has not said that just because similar ecosystems are already protected under the National Wilderness Preservation System that others should not also be protected

Response: These are just statements of facts If they were different from existing, then that might be cause for higher consideration

Letter: 1723 You do not list all wilderness options that were considered in the past listed Caney Creek North, Caney Creek South, and Patroon Bayou as possible wilderness sites Yet these are not mentioned in your discussion of post possible wilderness areas

Response: Caney Creek North & South had been eliminated from the list early in evaluation Chambers Ferry & Patroon Bayou are the same

Letter. 1723 (pg 4) contrary to the impression you leave, that Congress has not decided that not buying mineral rights bars a wilderness from being designated this is not a reason to bar or disqualify an area as being potential wilderness

Response. Not neccessarily by itself, but it is definitely a consideration to be evaluated with other factors

Letter· 1723 (pg 4) your road mileage is too restrictive Congress has overridden the FS in the past and has allowed roads to go through wilderness why are you being more restrictive?

Response: Following the Wilderness Attribute Rating System, all areas were given the same rating system

Letter 1723 (pg 5) you are contradictory with the ESA You say that you use it as a criteria but at the same time say you have decided that the RCW should be drawn out of wilderness elsewhere in this plan RCW you have already said is not a problem because you will draw it out of wilderness there are no ESA problems in wilderness

Response· Many aspects of 1200 meter zone mgmt would not be feasable in wilderness

Letter: 1723 On page 6, Table D-1, what do wilderness areas in adjoining states have to do with whether there is wilderness potential in the Texas NFs? foolish notion that has no basis in fact especially since Texas NFs have only about 6% set aside while the national average is 18% Where is the equity?

Response Broadbase planning does not necessarily have state boundaries Government ownership in TX is considerably lower percentage wise than in western states where larger percentage of state is in Gov ownership Thereby, presenting better opportunities to set aside areas that meet wilderness attributes

Letter 1723 On page 7, Table D-2, you add the ESA as a criteria when it is not a criteria found in the FS Handbook and you have noted will be drawn out of the wildernesses in TX This is rigging the analysis to make it seem like areas are not appropriate for wilderness

Response. Management for ES is an important factor to consider Some designation, i e Wilderness, RNA, Scenic Area, etc would be counter to necessary mgmt to maintain Endangered Species

Letter· 1723 *Big Woods--why does not the FS manage for a natural looking stand (plantations), the Lone Star Hiking Trail needs to be designated but is not* currently a National Recreation Trail

Response Not sure what stands are being referred to Private land sometimes inhibits natural looking mgmt

Letter 1723 Bounds Peninsula--undergrowth is not bad for wilderness but part of the ecosystem you do not need trail in wilderness

Response: That's true This is just another statement of fact concerning one of the criteria

Letter· 1723 Four Notch-- the RRD has 102,000 acres of land that provides opportunities for primitive recreation but elsewhere you say the only real primitive recreation is in wilderness and that there is a relatively small amount of semi-primitive recreation, you are contradicting yourself here

Issue: 30-4 EIS Appendix D

Response: Almost all NF land may provide a visitor a primitive experience depending upon their base of reference

Letter: 1723 Graham Creek--RCW can be drawn out of wilderness Upland Island is a wilderness with roads running through it wilderness study was biased

Response: Our Recreation Opportunity Spectrum evaluation, maps, areas of different opportunities, are based on certain criteria Primitive under ROS is mostly a mgmt objective, i e wilderness, even though we all know some are close to or can even have roads going through them

Letter: 1723 Indian Mounds--the map makes no sense since you propose to add acreage that will make it hard to be a wilderness you do not propose an alternative that minimizes potential confounding wilderness management factors

Response: The proposals are not FS proposals These are proposals by the public that are being evaluated

Letter: 1723 Jordan Creek--all mineral rights can be acquired, midstory trees do not need to be moved completely from RCW

Response: The law provides for acquisition of mineral rights It is however, highly unlikely that congress would provide the finding

Letter: 1604 The EIS splits its coverage of roadless areas (App D) and Special Areas The maps for roadless areas are often imprecise and hard to read Inadequacies in the maps of roadless areas include failure to indicate clear boundaries of the Stark Tract and the proposed 410-acre addition to Winters Bayou, and continuing to indicate in white (private) the areas that the FS has acquired in wildernesses such as Upland Island (EIS still calls it "Graham Creek") and Indian Mounds

Response: Improvements to maps & identification of Special Areas on Plan maps have been made Maps are to provide general information of location, more specific maps, USFS ownership, etc can be viewed on maps maintained at the S O

Letter 1723 Alabama Creek--if clearcutting mimics natural disturbances then how can it be considered a negative in any assessment of wilderness potential define what "no significant areas where no timber has been removed" define "improved road"

Response. Clearcutting is one of the standard criteria developed by DOI for Rare I, this concern relates to total timber resource & extend of removals Improved roads are those described in FEIS App E

Issue: 30-5 EIS Appendix E

Letter 1723 several rivers that should have been included or moved forward in the process were not The East and West Forks of the San Jacinto River and Caney Creek in SHNF [and] Big Creek Little Lake Creek in the Little Lake Creek Wilderness Area

Letter: 1723 No cutting, as mentioned before, in the wild, scenic, or recreation river corridor must be allowed only exception would be hazard trees in imminent danger of falling in an area often frequented by people

Letter: 1723 On page 27, Ayish Bayou, what does "adjacent to the bayou" mean? You do not acknowledge that there are sensitive plants along the bayou as pointed out in the Wilderness Appendix

Letter: 1723 On page 29, Segment 3, Neches River, you do not promote the old growth vegetation that is here excellent wood duck habitat

Response. Comment noted

Letter: 1723 you utilize criteria that are not appropriate for judging many of the rivers

Issue: 30-5 EIS Appendix E

Letter: 1723 The criteria used on pg 22-25 are not measurable how do you determine whether something has local significance recreationally? How do you define wildlife populations under Wildlife Values? How do you determine if "vegetation, water, and color all contribute to create exempary visual features". Why no criteria for solitude and quiet?

Response: Criteria were established by DOI, and NPS and are used throughout the country for evaluation of candidate streams

Letter: 1723 Some of your criteria are so strict that no river would qualify in East Texas

Response. The criteria for WSR's was established by the DOI and NPS

Letter: 1723 On page 28, McGee Bend, Angelina River, canoeing can be done what does "wildlife locally common to the forest" mean here? .say it is not free flowing drains the area below Sam Rayburn Dam, if it drains then the water is moving and you cannot say it is not freeflowing

Response. Angelina River segment around McGee Bend is not free flowing, it is backwater from the outlet flow at Sam Rayburn Dam and the rest of the river All of Angelina river below Sam Rayburn is controlled by outlet of Dam.

Letter. 1723 On page 31, Segment 4, Neches River, ignore the OG bottoms
Letter: 1723 On page 34, Segment 1, Neches River, you ignore the OG bottoms

Response: Don't have a good definition for OG It means different things to different people Geologic criteria is required

Letter 1723 On page 33, Cochinno Bayou, geologic criteria are not appropriate
Letter: 1723 On page 35, Segment 2, Neches River, geologic is not an appropriate criteria to use
Letter. 1723 On page 38, Tarkington Bayou, geological criteria are not appropriate here
Letter. 1723 On page 39, geological criteria for Winters Bayou is inappropriate I have seen a Canebrake Rattlesnake here you do not mention

Response. Geologic criteris is a required rating

Letter: 1723 On page 37, Henry Lake Branch, what does moderately scenic mean? There are large magnolias along this river and many scenic beaver dams

Response: Relatively speaking, low moderate and high, Henry Lake Branch would be moderate

Letter: 1723 apparently not all segments were visited and given the more detailed scrunity that the 11 segments that SFASU did This biases the review

Response: Some of the 26 rivers were eliminated from further study because of low flow rates, obstructions such as culverts, reservoir influence or other effects that would influence their eligibility

Letter: 1723 the FS talks about how the Canoe Trail at Big Slough Wilderness Area is difficult to canoe because of debris that has fallen into the water But there is no discussion that the FS can take hand tools into the Wilderness and keep the canoe trail open or have volunteers do this There is also no discussion of whether if the canoe trail is too difficult to keep open whether there should be a canoe trail at all if the FS can allow trail maintenance on the Lone Star Hiking Trail in Little Lake Creek Wilderness Area then why cannot the same be done for the canoe trail

Response· Hiking Trails in wilderness have been maintained by volunteers There have been no volunteers for maintaining the canoe trail in wilderness It is prohibitively expensive to provide salaried FS personnel to do this work There are higher priorities with the limited funds & personnel

Letter: 1723 I am concerned about greentree reservoirs because they flood habitat that is wetlands and is a productive as it can be and cannot be improved

Response: Actually, the areas flooded may not technically be wetlands They will provide waterfowl habitat for a 3 month period

Issue: 30-5 EIS Appendix E

Letter: 1723 On page 25, Attoyac River, define what is moderately scenic How did you determine this? What does susceptible to intensive timber management practices mean? What does relatively navigable mean?

Response: Low, moderate, & high are relative terms that are used along with professional judgement

Letter: 1723 I am opposed "manage the timber resource within this corridor to enhance values such as recreation and wildlife " This leaves things wide open for cutting in what must be a protected riparian area do not believe you can improve the habitat for wildlife and certainly not for recreation by cutting

Response: Can not find statement referred to Plan 8, 10, 11, 12, 20, 41, and 42 indicate or specify just the opposite

Issue: 30-6 EIS Appendix F

Letter: 1723 (pg 10 Exhibit A) if you have to estimate the numbers and distribution of reproductive individuals and determine if they are well distributed then you need to do more than monitor BOR

Letter: 1723 (pg 12) these are proposed regulations and have not been adopted This gives you some ability to be innovative and do a really complete job

Response. Comment noted

Letter: 1723 (pg 11) you need to say that you are working to reintroduce the Louisiana Black Bear and Red Wolf

Response: This is a TPWD decision We will work with TPWD in any efforts to reintroduce extirpated species

Letter: 1723 I have a real problem with the indicator section On 11-18-94 at the Wilderness Conference in Santa Fe, NM Dave Graber said the key questions were, What do we measure? and what is the relationship between the indicator and what it is supposed to indicate? These questions have not been answered in this section the only (thing) that is listed is Exhibit E, a two page list of indicator species There is zero discussion about what the indicators are supposed to indicate

Response. Many concerns have been addressed in the revised MI Tables The MI process identifies the steps & rational for MI development All MI's are keyed to a specific habitat group or seral stage as explained in the Appendix

Letter. 1723 (pg 3) you list that population trends of management indicators but then you do not even say that you will be able to determine the population levels of species or even try. In exhibit E you list a lot of species monitored via element of occurrence This just tells you whether you found a certain species in a certain area It does not tell you what the population of the species is or what the trends of that population is or what the relationships to habitat changes are you have a monitoring situation that violates the FS own federal regulations of what you must do

Letter: 1723 Exhibit B - there is no real discussion of specifically what criteria were used to pick MI other endangered

Response. The process record for MI are extensive The Appendix explains the steps & direction for MI, but records of the many meetings & coordination with Federal, State, University & other professionals are on file & may be viewed at the S O

Letter: 1723 (pg 3) you also call for flexibility in monitoring but what you really need is a specific protocol for monitoring This protocol must be able to catch downward or upward trends in populations Habitat conditions is too nebulous a term to use to be able to tell how a species is doing You are guaranteeing that you will not be able to tell how populations are really doing with the proposed system

Issue: 30-6 EIS Appendix F

Response. Monitoring elements are explained in the Plan, chapter V The degree of monitoring is based on use, T&E species receive more intensive activity while more common species received extensive monitoring action

Letter: 1723 (pg 4) you did not invite the public to give input as to what species they would like to see monitored You give no explanation as to why certain species were chosen Therefore your reasoning for your choices are not clear

Response: Public comments & proposals related to MI have been solicited, received, & utilized in the planning revision process since 1990

Letter: 1723 (pg 8) it appears as if you are ignoring state listed species and also Texas Organization for Endangered Species listed species

Response: All state listed species were evaluated during the MI process

Letter: 1723 (2621 1 #5) I do not see where this has been done and documented You need to include boundaries Will these be larger than compartments or the same and if the same why so?

Response: See steps 1-4 of the MI selection process, App F

Letter: 1723 (2621 3 #1) Has this been done? You need to explain how you did this and why you chose the boundaries you did

Response. See EIS App B

Letter: 1723 (2621 3 #3) I do not see this addressed for indicator species

Response: This information is in the computer analysis of the Alternatives & was utilized to describe effects in EIS, Chapter III

Letter 1723 (2621 4) where are the habitat components required by the MI and the mitigation measures needed to protect the MI from plan activities?

Response See revised MI table

Letter 1723 (2623 #1) I call this the carrying capacity Where are these figures I see some population figures under Exhibit E but no discussion on how they were derived and whether they are sufficient to establish well distributed populations

Response Habitat capability & carrying capacity are 2 different concepts Plan App F describes the process, details are found within the MI process record

Letter: 1723 (pg 38-39) the Bay Shrub wetlands is not just found as an inclusion in LLP areas I have found them in the San Jacinto RD in compartment 90 There are zero LLP in these areas The reality is again that EOR cannot tell you viability, population estimates or even distribution figures

Response: The MI identification of baygalls was not developed to exclude this from areas other than Longleaf-Little Blustem landscapes, but rather a way to indicate their importance as a microsite within that landscape

Issue: 30-7 EIS Appendix G

Letter 1723 *I am concerned that areas that qualify for RNA were turned down*

Response: All areas recommended for RNA status by the review committee have been assigned to MA-8a, Research Natural Areas, in this revision

Letter. 1723 (pg 13 & 15) remove ATV use from Boykin Springs and Trout Creek These are incompatible uses that destroy resources

Issue: 30-7 EIS Appendix G

Response: The statements you refer to are statements of fact ATV use does occur in these areas

Issue. 30-8 EIS Appendix H

Letter 1723 (pg 2) Quarterman and Keever also found that the climax for the Southern Region, which includes most of the Texas NF's was Southern Mixed Hardwood Forests The names that you are giving here to various plant communities denote mostly subclimax or disclimax communities Mixed hardwoods are the dominant species In the Van Lear and Jones paper these are called hardwood site types versus management/successional types ...you are proposing to manage for earlier successional types at the expense of later successional types which are more hardwood dominated

Response: Comment noted

Letter. 1723 (pg 3) I could not find the citation of Walker and Baker in the bibliography at the back of App H It is also important that the reconstruction of historical vegetation using old land surveys and other methods be done as soon as possible and in the interim decisions are not made which make commitments that contradict and keep the results of the vegetative reconstruction from being implemented when finalized

Response Appendix H has been edited & issues corrected

Letter: 1723 (pg 9) there is no discussion of other disturbances other than SPB and what amount of acres they affected and still do affect Texas NF's An average amount of NF land affected by each type of disturbance needs to be given for each average year This then puts natural disturbance factors and their overall importance into context

Response See EIS, chapter III for added discussion of disturbance factors

Letter: 1723 (pg 35) you under estimate the OG age of Loblolly Pines and hardwoods in the Loblolly-Oak Series As mentioned before in these comments Loblollies can get up to 250-300 years in age I have never heard of an Upland Dry-Mesic Forest You cannot combine two different moisture types which is what you have done by combining dry with mesic, which denotes intermediate moisture content

Response: This description is based on a national effort coordinated by TNC, the combination of these types identifies the similarity of the 2 types from a habitat standpoint Dry & xeric & mesic have been separated within habitat groups for the mgmt indicators

Issue: 30-9 EIS Appendix I

Issue: 30-10 EIS Appendix J

Issue: 40-1 Plan Appendix A

Letter. 1723 (pg 26) I am concerned about too little sampling being done to verify the tentative models

Issue: 40-1 Plan Appendix A

Letter: 1723 It seems like what you are advocating with the ECS and the App H & I is a method for allowing and justifying type conversion so you can say that scientifically this is okay I do not favor type conversion that leads away from the vegetation type that would normally dominate the site

Response: Comment noted

Letter: 1723 (pg 1) the discussion of EM is so general that the present forest plan could be argued to adhere to this the Regional Ecosystem Classification Team apparently has not finished the Ecological Classification Mapping and Inventory System Or has it? This not clear? there has been no formal public input period What will be done in the interim to ensure that commitments that violate the new system are not made?

Letter: 1723 (pg 3) what additional information is needed on Texas NFs? How is it expected to help modify the ECS as presently envisioned? When will the public get a chance to have input and review for this system, the system set out in this appendix has no inclusions policy I am opposed to leaving to districts in the landtype and landtype phase unit the responsibility for determining what is an inclusion The map of each ecological land landscape with land units must be checked by the FS for accuracy with help for TPWD, USFWS, and the interested public

Response: ECS is a continually developing & improvement effort as more information is gained, clearer identification of ECS components will be described Numerous state, federal, and university personnel, as well as organizations and individuals have provided information Your input is also welcome

Letter 1723 (pg 7) you ignore the San Jacinto River's influence in the San Jacinto RD and Raven RD of the SHNF Southwestern Gulf Flatwoods Subsection, why are there no numbers for precipitation

Letter 1723 (pg 13-20) if you have several LTA's that cross NF's how will you ensure that they are managed consistently? why do you not know if the Sweetbay Magnolia Series lives in Sandy Uplands This should be determinable When will you do this?

Letter. 1723 (pg 21-22) you keep saying Southwestern Loblolly-Hardwood Subsection but this is not listed on page 11 Why?

Letter: 1723 . Table 2, how can a landtype, which is supposed to be larger than a landtype phase be smaller as shown under the Map Scale/Size line? Also you do not explain the words and phrases used Please place a legend here so I can figure this table out

Letter. 1723 Table 3, the fire frequency is not given with years of fire it seems to me that the Big Thicket and San Jacinto should be very low and if so why do you plan to manage these areas with fire frequencies 2-5 or 3-5 years on the uplands which is a frequent occurrence and not very infrequent like the table says

Response· The table has been corrected.

Letter 1723 (pg 22) San Jacinto Flatwoods The hardwoods here are very aggressive due to the moisture and soil conditions LLP I do not believe can make it in this compartment due to poor drainage and hardwood competition You need to make this adjustment so you do not try to grow something where it does not belong

Response. These decisions will be made on a site specific basis

Letter 1723 (pg 24) under Big Thicket LTA you ignore hardwoods exist along creeks and slopes in very recognizable communities You need to list these as plant communities too!

Response. These are small components that will be described at the Landtype phase

Issue· 40-2 Plan Appendix B

Issue: 40-2 Plan Appendix B

Letter: 1723 (pg 2) you need a map to show where roads are, which will be reconstructed, what is their class now, which Ranger District they are in, what is the mileage and surface, what are the road speeds, etc In other words you need to show the cumulative impacts now

Response: Access needs for any given area are based on a site-specific analysis taking into account a variety of resource needs, constraints, and environmental factors as outlined in the S&G for the appropriate MAs TSL, reconstruction needs, mitigating measures, and locations for all transportation facilities are determined at that time Most reconstruction work will involve minor reconstruction as defined in EIS Chapter III, Part II(a), utilizing existing routes with Forest-wide S&G applied to minimize effects on the resources

Issue: 40-3 Plan Appendix C

Letter: 1723 (Pg 2, 1) compartments must not be the cutting planning unit These are not ecologically based Watersheds should be the planning unit

Response Ecological land type was the break for MAs 1 and 2 The compartment boundaries were used as an approximate boundary for purposes of modeling (estimation are within +5%) Site specific boundary will be determined on site during project implementation

Letter: 1723 (Stage 3, 2) you do not protect all areas that are sensitive

Response. All areas that are not suitable for timber management have been excluded from MAs 1 and 2 S&G will be used to insure protections of resources such as MA-1-16, MA-1-62, MA-1-78, MA-2-16, MA-2-62 and MA-2-78

Letter. 1723 (Stage 3, 3) I am not in favor of thinning hardwoods since you will destroy many by salvage

Response: Hardwood thinning in MA-2 is for purpose of RCW management, see MA-2-156, MA-2-157, MA-2-158, and MA-2-159 Also, in treatment for SPB, hardwoods may be cut, see FW-074

Letter: 1723 (4 , Table 1) where are the physically unsuitable acres You do not have a map to identify them on the NF they exist on The same holds for 5 , irreversible damage likely and not restockable within 5 yrs Where are these?

Response: Lands physically unsuitable for timber production are on the Sam Houston NF, within compartments 46 & 48, along East Sandy River Existing stands are hardwood Note, should be 203-13, not 213-3

Letter: 1723 (Table 5) bottomland area should not be grazed and should be put under 3 Land Withdrawn from Forage Production

Response Historically, grazing has been important to the area, but demand for grazing is decreasing See Plan, Chapter II, Mix of Goods and Service Issue Range Therefore, with the demand decreasing, the amount of bottomland acres used for grazing will become minimal on the forest Most of the bottomland acres for the preferred alternative are within MA-4 Monitoring of the livestock grazing will take place and the cattle will be restricted, controlled or excluded if evidence of degradation occurs Also, within MA-4, there will be no supplemental livestock feeding nor salt/mineral blocks Bottomland acres by management area MA-1-6028 acres-grazing permitted, but with de-emphasize MA-2-7520 acres-grazing permitted, but with de-emphasize MA-4-38353 acres-area closely monitored and restricted if evidence of degradation occurs MA7-5525 acres-grazing discouraged MA-8-3497 acres-not suitable. MA-9-696 acres-not suitable MA-10-206 acres-not suitable

Letter. 1723 (Table 6) you plan to cut up SHNF the most It appears as if you will cut too much bottom and potential OG with this proposal

Response: Only 13,548 acres of bottomland are within MA 1 and 2, therefore on a 120 year planned rotation, this will be a little more than 100 acres a year NF wide Of this total, only 3989 acres are on the Sam Houston, therefore less than 35 acres are estimated to be cut each annually Also, with acres being approximately the same for the Davy Crockett, Sabine and Sam Houston NFs, how did you calculate that the Sam Houston NF will be cut up the most?

Issue: 40-4 Plan Appendix D

Letter: 1723 you need to list and protect the Texas Organization for Endangered Species listed species On page 3 the FS needs to work on documenting the Southeastern Myotis the Canebrake Rattlesmake ought to be more than a Watch species On page 4 Nodding Nixie has been found on the Sam Houston NF You also need to include Southern Cranefly, Green Rein, and Southern Twayblade Orchids because they are adversely impactd by timbering activities

Response: State & Federal agencies, university and USF resource personnel, as well as public comments were used in developing this list It will be updated on at least an annual basis Your input is appreciated

Issue: 40-5 Plan Appendix E

Letter: 1723 (pg 3) I am totally against adding 200 more miles of ORV trail to SHNF The present trails are not up to trail standard and the FS does not have the law enforcement and personnel to adequately police the area for violations

Response: Comment noted

Letter. 1723 (pg 4) I am against the upgrading of all forest roads You need to close roads and not add more and improve them In addition you need to do an EIS on the proposal to designate and upgrade the roads on pages 4-5 as Forest Highways. What will be the impacts on wildlife and the environment?

Letter 1723 (pg 1) projected demand should not play a role It must be need and environmental damage and what has occurred in the past Can the area be maintained to standards? What about the loss of solitude and quiet? Where is carrying capacity?

Response All USFS projects are evaluated on a site specific basis to include impact assessment on the human environment

Letter 1723 (pg 2) I oppose Kelly Campground construction because you cannot control ORV use and it has been severely abused already I opposed Cagle because of the RCW colony there I also oppose Tarkington Bayou because the isolation and solitude and quiet of this place will be destroyed by a developed campground here why is the Lone Star Hiking Trail given only a medium rating and priority?

Response These rankings were based on a number of factors that can be reviewed in the LMP process record

Issue 40-6 Plan Appendix F

Letter: 1723 FW-185 refer(s) to Appendix F but then you do not explain what the soil compaction limits mean and how they were derived the limits are not soil or NF specific

Response The standard has been clarified The tables listed are based on significant research & process record information, you are welcome to review this material in the SO

Issue: 40-7 Plan Appendix G

Letter: 1723 2f, I do not accept the medium rating because ORV trails are still eroding and still not up to trail standards

Issue: 40-7 Plan Appendix G

Letter. 1723 It seems to me that you admit that EM cannot be adequately monitored via 4g, 1b, 1c, and 3a with the ratings that are given For EM to work the whole plan depends on the columns to all be filled out and be accurate

Letter: 1723 2d, unacceptable conflicts, your monitoring is pathetic Most people do not write They leave an area and do not come back when there is a conflict Your whole proposal here does not make sense

Letter 1723 4c I doubt you will have the high precision and reliability that is stated to tell about species diversity since there are not enough biologists to do this monitoring

Letter: 1723 4g It is worrisome that you have such low precision and reliability to tell if fire is improving the ecosystem

Letter: 1723 5d a statewide monitoring network will not tell you if air meets NAAQS in the NF's You need monitoring in the forest It is also of concern that you have a low precision and reliability of telling if ozone is hurting vegetation This is not acceptable

Response Comment noted

Letter. 1723 many times there are no real measurements or the measurements are too general (Appendix G 1b, 1c, 3a, 3i, 4g, and 5d)

Letter: 1723 4a what is the difference between moderate and medium?

Letter: 1723 4b the precision and reliability is low to determine if hunting hurts nongame species How can you do better?

Letter: 1723 5a who will sample for water quality?

Response: The M&E table has been changed to reflect this

Letter. 1723 3c, what kind of sample surveys will you perform?

Response: Acres of Ecosystem restored through landscape level (GAP) type analysis & species surveys on the site

Letter: 1723 1a) there are no criteria Why?

Response This table has been corrected to reflect your concern

Issue 40-8 Plan Appendix H

Issue: 99 Other

Letter: 1437 as president of the SJCFLA, I would like to inform you that myself, along with the other officers and directors have reviewed Mr Vann's [letter #1767] letter and we do agree with and support his concerns and recommendations set forth in the letter Please give these matters additional consideration in your revision of the management plan

Response: Comment noted

Issue: 99 Other

Letter: 75 We must protect our natural resources for our children and their children
Letter: 79 We need to save what is left for the future with cautious management

Response: Trees, like all living things, do not live forever When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again Trees planted in 1920 are now 60 years old, stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc Regeneration ensures today's forests will be here tomorrow All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended.

Letter: 69 I would like to see an annual statement of the percentage of NF land in Texas that has been converted to even-age pine plantation

Response: Approximately 22,000 acres of already existing even-aged pine stands have been regenerated since 1987 However, there have been no conversions to even-aged pine stands during that period nor are there any planned in this revision

Issue: 99-1 Not in the Scope of the Plan

Letter: 4 Our state forests are what make our lands so naturally fulfilled
Letter. 118 Salvage cutting in Wilderness Areas affected by the southern pine beetle will not achieve Charles Wilson's "expressed" goal of protecting nearby private timber
Letter: 151 Until we get a handle on over population, every effort must be made to protect our natural resources
Letter. 221 Recent frenzied deforestation of second growth mixed forest in one of the small NFS compartments near my home has had a devastating impact on wild creatures that once lived there now all destroyed by an insane system of subsidized and institutionalized deforestation, partly supported by banks, congress, law enforcement, and universities
Letter: 231 The FS couldn't manage a 1/2 acre watermelon patch
Letter. 259 The FS as a whole has done a dismal job of managing our country's forests - redwoods harvested for a bunch of stupid picnic tables & wood for Japan' future generations will be denied the benefits of so much because of the current slant toward the business interests
Letter: 319 Like you and other timber product users I consume my share I am willing, however, to buy used furniture, recycled paper products and to separate my garbage everyday so that fewer trees can be cut
Letter: 389 I hope you drive south from Kountze to Beaumont and just see how many trees have been cut - It's a SHAME! Where are our birds going to nest?
Letter: 565 Help us protect our environment Things that are done to damage it can seldom be undone
Letter: 1165 I encourage any effort which aims to reduce our reliance on forest products
Letter: 1636 If Gifford Pinchot were alive today he would probably be laughing and crying at the same time over the effort you are having to put into planning
Letter: 1660 Can we please just use common sense here? Protect this Earth - it's the only one we've got'
Letter: 1663 I live next to NF land and would like to see as much as possible that the land be left wild
Letter: 1670 Internal paperwork and mailings should be on double-sided copies
Letter: 1670 The dishonesty of the USFS is appalling
Letter. 1670 Sell the National Forests--but not the wilderness--to private companies and we can all find something else to do
Letter. 1781 We, my family, own timber land in Louisiana, where we take great care of the environment Surely, such care should also be taken by land belonging to the nation - especially as an example to the private sector

Response: Comment noted

Letter: 280 Please do not destroy my children's heritage Leave nature alone

Issue: 99-1 Not in the Scope of the Plan

Letter 1138 Please make an effort to save the forest for my daughter and her generation
Letter. 1143 it is important to conserve our natural resources.

Response· See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter. 624 Tourism in NF lands is increasing I'm sure the communities in the area will benefit just as much by protecting our resource (not logging corporations)

Response: The FS strives to maintain NFGT benefiting all mankind Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy

Letter: 862 It is time we stopped giving away our natural resources without protection for wildlife and plant communities It is not our right as human beings to destroy our environment to get the commodities we want
Letter. 1329 I don't understand the forest services catering primarily to the greedy interests of lumber people and not preserving our heritage with thoughtful and careful management

Response: Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons For example, timber sales are used to improve the habitat of the RCW Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesireable mid-story vegetation, by installing artificial cavities in trees, etc The NFGT do not have a "below cost" timber sale program Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than $15 million in revenue from timber sales, and just spent about $5 million on timber sales and all the other costs associated with timber sales The net revenue to the U S Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY

Letter: 1310 Roads are ubiquitous on private lands, in cities, in rural areas, everywhere Public lands are the one place where it is possible to not have so many roads It makes no sense to honeycomb public lands with roads also

Response With State, County, and FS routes, a transportation system is in place that meets access needs into most areas of the Forest This system will, however, require some reconstruction to meet expected use needs with the majority of the reconstruction involving minor work as defined in EIS Chapter III, Part II(a) utilizing existing routes The FS road system must meet not only the access needs for resource production, but must also provide access for a wide variety of other uses and needs including recreation, mineral exploration, special uses as well as taking into consideration the mobility needs of people with disabilities

Letter· 1167 I urge that the NF&Gs in Tx be designated as a National Natural Preserve and Wilderness, and with NO development activities, NO logging and roads, with the Preserve to include 2,094,750 acres and the Wilderness to include 837,900 acres
Letter. 1181 philosophy of the USFS is long overdue in changing from that of a business in which the great American diety, MONEY, is worshipped to a philosophy of gratitude, honor & respect, love for what nature put here
Letter: 1310 The FS should request to the Congress that the method of payments to local counties and schools be changed
Letter: 1310 FS payments to counties and schools should be based on acreage, not on income
Letter: 1310 Reduce the bureaucracy and the budgets for all these areas (grazing, wildlife, campgrounds, timber) Increase the budget for law enforcement and land acquisition Save the taxpayers a few million dollars a year
Letter 1310 tried to help get appropriations under the Land and Water Conservation Fund for certain land acquisitions Congress just doesn't seen to be cooperating It should be possible to shuttle some money from other budgets to get the parcels identified as of highest priority

Issue 99-1 Not in the Scope of the Plan

Letter. 1611 I propose 1) the USFS support repeal of the KV Act In lieu of the act's all sales of timber from NF be ceased 2) That each USFS unit be totally funded by line item with no funds coming from local sales, or operation or management of the NF 3) That all sales, concessions, use fees, etc , on NF lands go directly into the general federal treasury Each NF would stand alone with respect to funding

Letter: 1611 I propose that 1) all cutting, hauling, trimming, salvage, etc done for scientific reasons be done solely by NF employees and with the oversight of the research division of the USFS That there be no contracts with local providers that would profit directly from timber management decisions Even fuel expenses should be purchased outside of the county to avoid any dependence by the community on cutting activity on the NF 2) That all FS staff be reviewed for possible conflicts of interest with relationships with local timber companies and private businesses who currently do business with the Service

Letter· 1611 I propose that 1)no tree is cut for the purpose of profit for anyone on NF lands Trees cut for beetle control, thinning, fire control, or other scientific purposes be used solely for the use of the FS for building, construction, erosion control, or other non-fund enhancement use 2) That a special committee that includes representatives from the research branch of the FS be empaneled prior to the cutting of any tree on the NF, to approve the final cutting and tree disposition plan Consideration should be given to inclusion of non-forest service and non-timber industry persons from the community that can help the FS move from the "crop" approach to the "museum" approach Perhaps a museum curator might be a good choice 3) That bio-diversity be the order of the day

Response: Comment noted, though this is really a congressional-interest item

Letter. 194 I think that fund sharing to the county, schools etc should be on an acreage or some other method, possibly including resources from user fees etc as long as fund sharing is from commodity production only, forest resources will (be) over utilized

Response:

Payments to counties are based on the revenue from each Forest Revenue payments to each county are based on the percent of the Forest occupying a specific county land Any other means needs congressional action

Letter: 221 When the NFS acquired east Texas land there were a few acres of original Big Thicket wilderness left that they could have saved for future generations but chose not to

Response: The Big Thicket is part of the NPS The NFGT is not involved with management of Park Service lands

Letter: 187 As I sit here reading the information provided to me by the Sierra Club, I wonder about the future I'm sure you are not interested in the musings/ thoughts of a 35 year old Mom But, I'd like you to consider that all the actions you take, specifically in this land management and generally, in what the U S government citizens do greatly effect what will occur in the future and globally Too often we react in the short term rather than think of how our choices will relate in the long terms We need to think about the future, what will be left for our children

Letter: 240 Can't anyone see what our prize forests will look like say hundred years from now A few jobs and money can never replace these National Forest

Letter: 266 Please allow the "National Wood Farm" to become a "National Forest" once again

Letter: 318 citizens of Texas CARE about our natural resources They belong to us and not only those who stand to profit from them

Letter: 563 Please help us use our resources wisely This is so important for our children's sake

Letter· 594 We have so little untouched wilderness left please do your best to protect all of our natural resources

Letter· 653 too much emphasis on today's consumption and too little on saving for tomorrow's citizens

Letter: 844 please consider our future generations

Letter. 845 The public derives its value of the land when it is left alone

Letter. 852 It's extremely important in day & age that we provide good stewardship

Letter. 853 If the earth continues to be destroyed we will look like Mars

Letter 884 irreversible damage has been done we have to begin to respect the finite resources God has blessed us with, TODAY

Letter. 1501 My husband, three sons, and I are all avid bird-watchers, hikers, hunters, and native Texans We look forward to many years of enjoyment in Texas' forests Please help protect them for us and for those to come

Issue: 99-1 Not in the Scope of the Plan

Response: Trees, like all living things, do not live forever When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again Trees planted in 1920 are now 60 years old, stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc Regeneration ensures today's forests will be here tomorrow All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended

Letter:	70	Our national forests, deserve preservation
Letter:	74	Commodity production is an out-dated practice Public lands should be managed for recreational and aesthetic benefits
Letter:	90	I do not believe that timber cutting should be allowed in National Forests
Letter:	95	I think there should be no cutting in the National Forests
Letter:	181	I would prefer even more stringent protection of the ecosystems effected, where ever I go I try to visit the natural parks & preserves and I always come away understanding the precious nature of these areas
Letter:	184	Cherish or perish Please help us in this process of individual and collective responsibility
Letter:	198	We need to start saving the land and trees to have new National Park, State Park or Natural Areas
Letter:	225	If we can't have beauty and peace and quiet in a park, then we should give them all to the greedy Big Money Guys
Letter:	249	As a long time resident of East Texas I grew to appreciate these forests and feel strongly that no trees should be cut in our NFs
Letter:	328	I am totally depressed and angered by the destruction of our national forest Please do something to stop the desecration of our national resources
Letter:	333	so much of Texas' most beautiful lands are still in private hands So the precious few public lands we have must be protected When I see the unnecessary wholesale cutting in the forests, it makes me feel that we are regressing in our understanding of ecosystems
Letter.	360	It's time to start managing our NF as true forest and not special interest tree farms
Letter:	569	The USFS should protect at all costs, our natural environment which, if not preserved NOW will continue to deteriorate until there is nothing left to protect
Letter.	572	We need to protect the wildlife keep the streams clean and make it where all ages of people can enjoy camping, back packing or just setting and enjoying the beauty
Letter:	841	need our help in preserving the land and its wildlife
Letter	846	help us preserve what we've got now
Letter:	847	Please be a responsible supervisor and good steward of the land
Letter:	850	I personally believe that NFs should not be used for timber harvest at all - there's plenty timber company private land for that
Letter	956	We must do everything possible to preserve the beauty of our state
Letter:	982	I oppose any timber cutting in our National Forests
Letter:	1080	Multiple uses such as harvesting and recreation have a place, but only secondarily to preservation
Letter	1089	In my opinion NO cutting should be allowed for commercial use in our NFs!
Letter:	1113	I've always felt that the FS was implemented to "protect" this resource, not to capitalize on it
Letter:	1265	now is the time for emphasis to shift from revenue production to protection
Letter.	1357	I know what a valuable resource the forest are in Texas I would hate to see them or any forest damaged anymore than they already have been
Letter:	1506	Why is it I have to write so many of these letters, OUTRAGED that the people that we entrust to make the right decisions, seem to ignore what is self evidently the RIGHT decision & pursue a path that prospers a few corporations lookout for the best interest of the forest' For us & our children, I don't want to take my kids to see a TREE FARM, where once there was a forest
Letter:	1616	It is time to redefine the reason for being for the Forest Service If not then change the name to National Timber Management Service How can it be a forest service if the current practices are causing biodiversity loss, soil erosion and water pollution in our National Forests in Texas?
Letter	1669	We need a change in Forest Management If I'm not mistaken, the tax payers pay you peoples salary So act like you're supposed to & protect the forest
Letter:	1726	There is little in the way of natural recreational opportunity in Houston except for the nearby forests They should be preserved!
Letter	1749	I live and own land in a county where we have seen huge sections of forest developed by get-rich-quick realty schemes I am really fed up with the emphasis on harvesting, rather than protecting the few parcels of protected (so-called) land left - called our National Forests and Grasslands

Issue. 99-1 Not in the Scope of the Plan

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 106 Let's remember that we're a first world country-and first world countries don't export raw products
Letter: 532 I object to the present shipment of our natural beauty to be cut and shipped to Japan for homes to a civilization that has in the past caused bloodshed and the present trade deficit
Letter: 1579 And quit furnishing them (timber) to foreign countries - I don't understand the economics of "trade" so say to heck with sending our trees out of the country

Response: We are unaware of any unprocessed logs from the NFGT being exported

Letter: 156 I have seen the timber cutting and hauling in the mountains of New Mexico, north of Taos in dead winter FS graders and bulldozers were keeping forest roads open losing money by selling our assets This happens here in Texas also

Response: Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than $15 million in revenue from timber sales, just spent about $5 million on timber sales and all the other costs associated with timber sales The net revenue to the US Government from the timber sale program was about $10 million The timber sale program on the NFGT generated about $2 86 for every $1 00 of tax dollars spent during the FY

Letter: 192 Please think of our CHILDREN'S future - we need to protect our resources and use them carefully
Letter: 256 I wish to be able to continue to enjoy our NFs and hope that future generations may do so

Response: NFs are managed in accordance with MUSYA principles Appendix B of the EIS details the analysis for the timber harvest levels for each alternative

Letter: 1679 The Draft FP does not address grazing fees rates Rates should be set comparable to fees on private land

Response: Congress controls grazing fees

Letter: 335 I want to thank you for getting things started and on the road to open dialogue It appears we finally are getting someone to listen to the varied needs of users and then try to accommodate all of our varied interests and still maintain some form of sanity in the utilization of our heritage I am taking this couple of minutes to tell you guys THANKS Now don't get all swell headed, we are not on the same page yet, but we are at least in the same song book Please let your subordinates know that I appreciate their efforts Keep up the good work

Response The IDT appreciates your support

Letter: 1125 Under no circumstances will I ever vote for a candidate or an administrative agency promoting clearcutting of NF lands

Response. Recent direction from the Chief limited clearcutting on NFS lands to areas where it is essential to meet FP objectives and where particular circumstances require it The selected alternative incorporates this direction while providing that regeneration cutting methods be determined on a site-specific basis

Letter: 1266 There is very little public lands in Texas We believe these lands were set aside as National public lands to insure intact forested ecosystem remain
Letter: 1302 Somewhere and now we must begin proper management for the benefit of future generations In 200 years we have destroyed 50% of our rural environment Now is the time to begin saving the balance thru proper management

Issue: 99-1 Not in the Scope of the Plan

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " in accordance with FLPMA Section 103 (c)

Letter: 1658 At one time I knew & enjoyed & loved that forest (Sam Houston NF) & all the others very much However the way you have changed it to a near pine plantation, following the footstep of the timber company treatment of their land, is pretty sick I am against any timber cutting in our national forests

Response: The NFT does not manage for pine monocultures but for longleaf pine, xeric and dry-mesic oak pine, mixed loblolly-hardwood, mesic hardwood and bottomland hardwood communities These are described in detail in Chapter III Part I(a) of the EIS The effects of each alternative are analyzed in the same section

Letter: 993 The plan, as written, is so difficult to read and follow that at times I have suspected that you were trying to play a big trick on all us Sierra Club and "the like" by producing a big cloud of VERBAL SMOKE I feel certain that I could do almost anything within the guidelines and definitions that you have published

Response: The FP is an implementation guide for the selected alternative It is to be used by people with a working knowledge of forestry and the mission of the NFGT

Letter: 1126 The developer in my area bulldozed his entire parcel before building It has taken the residents of our area 20 years to provide modest growth for the wild creatures who once lived in our area How long will it take you to restore the entire ecosystem of the East Texas Piney Woods?

Response:
The development to which you refer occurred on private land NFGT does not interfere with the management of private land However, humans and their land uses are a part of the ecosystem The entire ecosystem of ETX includes cities, farms, and man made lakes, such as Lake Sam Rayburn The NFGT can only manage for ecosystems that occur naturally on FS land

Letter: 1441 The new office at Apple Springs is ample space, and conveniently located for all employees - the necessary practices can be accomplished from this hub
Letter: 1442 I am concerned with the possibility of the office here being moved to Ratcliff
Letter: 1569 I would like to take this opportunity to let you know what an important part of the (Apple Springs) community you (Trinity) District is and hope it will continue to be a vital part of our town
Letter: 1624 It is our understanding there is a possibility of turning the work center (Trinity RD) into a visitor information center only We sincerely hope this does NOT happen
Letter: 1750 As a citizen of Apple Springs I feel the FS is very important to our community We should not have to depend on someone from Ratcliff to assist us

Response:
Office location is not a FP decision, but a political one Your letter was forwarded to the FS for response

Letter: 638 It is a disgrace that our national government is so poorly run that we have to still deplete our national resources

Issue: 99-1 Not in the Scope of the Plan

Response The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness, and determine for management systems, harvesting levels, and procedures " Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources Trees are harvested for many reasons to maintain or improve the health of timber stands, to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons For example, timber sales are used to improve the habitat of the RCW Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc See app B for constraints used that ensure renewable resources are available in perpetuity

Letter: 1594 Look and read how many deserts are being made today by too rapid cutting and burning of forests all over the world

Response. The NFT has no control of the management of forested land that is not within NFT boundaries

Letter· 1776 I would suggest the FS use less expensive paper when printing up these documents I do not see this quality of paper used in corporate America

Response: The paper is purchased through GSA contracts which are awarded to the lowest responding bidder for that fiscal year

Letter· 1310 It appears that the FS has done here what it does with its timber program First it decides how it wants to manage the timber and then it tries to force everything else to fit in a mold that melds with the timber plan Here the FS, with already too many roads decides to build more and then tampers with the definitions in the ROS classes to make them fit in with the road building program You can't honestly call recreation semi-primitive when you're only a quarter-mile away from a road

Response· The Glossary has been changed to clarify your concern, the true distance is 1/2 mile

Letter: 1310 Probably it's impossible to provide primitive recreation any more on the TNF's, but the FS should strive to provide opportunities as close to that definition as possible, rather than following its present course of building more and more roads and continually degrading the recreation experiences for remoteness and solitude This is inequitable and unfair Why should one set of forest users be catered to exclusively?

Response: Each mgmt area has a defined VQO & ROS objective, many which offer semi-primitive non-motorized recreation These objectives allow us to provide recreationally a "full" spectrum on the NFGT

Letter 1648 USFS spending will need to show a direct benefit to the taxpayer Any commodity production, leases or grazing will have to be at market rates, show no net loss of tax dollars, and not create unfair competition for local providers How can local timber growers currently compete with the USFS? How about a landowner who could lease grazing rights if it wasn't so much cheaper in the national forest? Local governments are going to suffer during these changes unless we move to a payment in lieu of taxes that does not depend on factors related to commodity production of USFS activity

Response: Costs & benefits are fully documented for NFGT use, the actual estimates are part of FEIS App B The system of payment used by the NFGT is directed through legislation, any change in payment method would have to be mandated

Letter. 604 I have to pay forty dollars a year in order for my two four wheelers to be legal of forest trails No hiker or camper, as far as I know, must meet this requirement Included in the permit fees are road and bridge fees and we are not allowed to ride on either

Response: That is a state regulation The state legislature passed laws requiring the use of all ORV's to be regulated on all public land

This completes the

Comment & Response Section

of Appendix-K

The following 16 pages

are letters from

Federal/State Agencies

and Elected Officials

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

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pls make appropriate distribution

Mr. Robert Joslin, Regional Forester
Southern Region
U.S. Forest Service
1720 Peachtree Road NW, Ste. 951
Atlanta, GA 30367-9102

Dear Mr. Joslin:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas has completed its review of the U.S. Forest Services's Draft Environmental Impact Statement (DEIS) for revising the Land and Resource Management Plan for the National Forests and Grasslands in Texas (NFGT). The NFGT consists of the Angelina, Davy Crockett, Sabine, and Sam Houston National Forests in east Texas and the Caddo and Lyndon B. Johnson National Grasslands in north central Texas. There are approximately 637,000 National Forest acres in 12 counties and 38,100 acres of National Grasslands in 3 counties.

In addition to the No Action alternative, the DEIS analyzes the effects of eight action alternatives that propose to address forest plan objectives such as: a balance of natural values with timber production and market commodities; improvement of riparian and wildlife habitat, maintenance and improvement of threatened and endangered species habitat, emphasis on recreation, special areas, and urban forests, etc.

EPA offers the following comments for your consideration in development of the Final Environmental Impact Statement (FEIS).

PROPOSED ALTERNATIVE

The U.S. Forest Service (USFS) preferred alternative (Alternative 4b) proposes to emphasize corridors between red cockaded woodpecker (RCW) habitat management areas. We concur with the USFS's determination that Alternative 4b establishes a fair balance in meeting the economic needs of the various forest and grassland users and local counties, while providing for the protection of RCW and other natural values. In addition, this alternative supports the stated objectives of the NFGT Revised Forest Plan.

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AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

We found the affected environment to be well described. However, the scale of the maps provided with the DEIS to define the management areas and each of the proposed alternatives made it difficult to interpret many of the features within the project area and the proposed improvements. We suggest that either the scale of the maps in the FEIS be adjusted to facilitate the identification of natural and proposed features within the project area, or the current maps be further refined and additional relevant features be labeled.

SOUTHERN PINE BEETLE CONTROL

We recommend that a summarization of the control actions and standards specified in the 1987 Southern Pine Beetle Control EIS be provided in the FEIS for the benefit of readers. We found too much emphasis in the DEIS on the incorporation by reference to the other three regional programmatic documents (the Southern Pine Beetle, Vegetation Management, and Red-Cockaded Woodpecker EISs) without the benefit of discussing decisions made as a result of these environmental analyses.

CUMULATIVE IMPACTS

Limited discussions on cumulative impacts for some resources are scattered throughout the document. A summary of all cumulative impacts listed by affected resources could be presented separately for the benefit of readers.

EPA DEIS RATING

EPA rates this proposed action/DEIS as "LO," i.e., EPA has "Lack of Objections." Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions.

We appreciate the opportunity to review the DEIS. We request that you send our office two (2) copies of the FEIS at the same time that it is sent to the Office of Federal Activities, EPA, 401 M Street S.W., Washington, DC 20460.

Sincerely yours,

Allyn M. Davis

for Jane N. Saginaw
Regional Administrator

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Stephen F. Austin State University

P O Box 6109, SFA Station • Nacogdoches, Texas 75962 6109
(409) 468-3304 • FAX (409) 468-2489

College of Forestry
Office of the Dean

December 8, 1994

Forest Supervisor
National Forests and Grasslands
U S Forest Service
701 North First Street
Lufkin, TX 75901

Dear Mr Newman

The purpose of my letter is to provide comments on the Forest Plan Draft Environmental Impact Statement

I have the following concerns about the preferred alternative 4(b)

1 I am concerned that such a large proportion of national forest acreage is devoted to single species management (RCW) at a time when more emphasis is being placed in biodiversity I believe that it is inevitable that the current, and soon to be revised, RCW Management Guidelines will be repudiated as too restrictive and limited in terms of habitat diversity The exception, I believe, will be longleaf pine/bluestem ecosystems

2 The preferred Alternative 4b will not provide for much early successional habitat which is critical for many of the neotropical migratory birds More should be done to address the habitat needs of such species

3 Ecosystem management as described in the Draft EIS is, in many respects, very labor intensive There will be increased needs for various types of expertise and for a labor force to implement the management strategies It does not appear that funding levels will be sufficient to permit the U S Forest Service to do all that will be needed to implement alternative 4b

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Although I have concerns about the preferred alternative, I am aware of the current pressures on the U S Forest Service to manage public lands for RCW and to implement ecosystem management. I applaud your efforts to restore longleaf pine ecosystems in the region

Sincerely,

R. Scott Beasley
Dean, College of Forestry

RSB/jw

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CURTIS TUNNELL
EXECUTIVE DIRECTOR

TEXAS HISTORICAL COMMISSION

P O BOX 12276 AUSTIN TEXAS 78711 2276 (TELEPHONE) 512 463 6096 (FAX) 512-463 6095 (RELAY TX) 1 800 735 2989 (TDD)

DEPARTMENT OF ANTIQUITIES PROTECTION

November 28, 1994

Alan G Newman
Forest Supervisor
U S Department of Agriculture, Forest Service
National Forests in Texas
701 N 1st Street
Lufkin, Texas 75901

Re Comments on the Draft Revised land and Resources Management Plan and Draft Environmental Impact Statement for the Revised Land and Management Resource Management Plan
(FS, F2)

Dear Mr Newman

Thank you for allowing us to review and comment on the above referenced documents Overall, we believe that proposed plans for considering cultural resources should result in the protection and enhancement of these resources Our specific comments are enclosed

If we may be of further assistance, please contact Mr Bill Martin of our staff at 512/ 463-5867

Sincerely,

James E Bruseth, Ph D
Deputy State Historic Preservation Officer

Sincerely,

Timothy K Perttula, Ph D
Assistant Director for Antiquities Review

JEB/TKP/wam

Enclosure

The State Agency for Historic Preservation

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Comments on:
Draft Revised Land and Resource Management Plan and Draft Environmental Impact Statement for the Revised Land and Resource Management Plan, USDA *Forest Service, National Forests and Grasslands in Texas*

Draft Environmental Impact Statement for the Revised Land and Resource ***Management Plan***

GENERAL

This office believes that EIS Alternative 4b, the alternative preferred by the National Forests and Grasslands in Texas, does not offer as much protection to areas with a high probability for containing historic properties as do Alternatives 6 and 7.

SPECIFIC

Issue 1 Biodiversity

Alternatives 6 and 7 both greatly increase the width of the streamside and bottomland zones that are kept free from timber harvesting Although this management practice is primarily intended to increase biodiversity, it also will serve to protect historic properties, since these zones have the highest potential for containing archeological sites

Issue 3 Special Management Areas

Alternatives 6 and 7 both have the greatest number of Special Management Areas where impacts of all kinds, including those from recreation, are strictly controlled Again, by removing more areas from potential impacts, historic properties will fare better than under other alternatives Under the FS/SHPO Heritage Management Plan, additional historic management areas are proposed, which we believe should be considered to enhance cultural resource protection on the forests

Issue 4 Off-Road Vehicles (ORVs)

In our opinion, Alternative 6, which prohibits all ORV use, offers the best protection for cultural resources ORVs used in an off-trail setting during wet conditions can create serious ruts which damage shallow archeological deposits Alternative 7, which eliminates open use of ORVs and confines such use to a trail system may be a more realistic compromise, since people who own ORVs are going to go somewhere to use them At least there is some degree of control of their use under Alternative 7.

Issue 10, Recreation

Alternatives 6 and 7 will require an increase in the construction of horse trails This work will require cultural resources surveys that follow the stipulations of the R8-PA, the MOU, and the *Heritage Management Plan*

Issues 14 and 15 Lands and Minerals

Alternative 6, which eliminates leasing land for mineral exploration, would prevent any impacts to cultural resources from oil and gas exploration on Forest Service lands However, since the overall impacts to cultural resources on the National Forests and Grasslands in Texas has been relatively minor in the past, eliminating such exploration may be unnecessary Alternative 7, which simply decreases lands available for leasing may be a more reasonable alternative

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Draft Revised Land and Resource Management Plan

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p. 60. Cultural Resources. FW-041 through FW-046, which outline the cultural resource inventory and evaluation process, follow directly from consultation regarding the R8-PA, the MOU, and the Heritage Management Program. Overall, we concur with the wording, but believe FW-045 should be clarified. Currently, it reads:

FW-045 Conduct comprehensive cultural resource inventories on areas not surveyed as part of site-specific analysis.

This statement is too broad and fails to reflect that thought has gone into the selection of areas that will be surveyed. The statement should note that these surveys will follow the compartment prioritization plan described in the Heritage Management Plan. This would clarify that only certain areas considered to have a high potential for containing historic properties will be surveyed.

p. 67. Lands. FW-082 permits temporary group events on National Forest lands. Please note that all activities by such groups should be limited to areas that do not contain significant cultural resources. The use of the forest by the Rainbow People in 1992 led to damage as a result of digging latrines on an important historic site.

FW-142 calls for ORV use to be limited to prevent damage to natural resources. We would wish to include cultural resources.

P. 89. MA-1-52 calls for allowing ORV use both on and off permanently marked trails. We believe that ORVs can damage archeological sites and urge the Forest Service to limit their use to marked trails.

p. 119. Recreation Management. MA-3-74 calls for the development of shooting facilities on the grasslands and limiting firearms use to such facilities except for shotguns and blackpowder arms used for hunting. We urge the Forest Service to proceed with construction of such a facility on the LBJ National Grasslands, where recreational shooting in a gully has led to partial destruction of a lime kiln site that we believe is eligible for inclusion in the National Register of Historic Places.

p. 151. Research Natural Areas. MA-8a-11 reads:

An inventory of cultural resources is needed only if sites are located and determined to be significant to understanding the cultural past.

This statement is not consistent with the MOU and Heritage Management Plan. Under the terms of the Heritage Management Plan, Research Natural Areas would be surveyed whenever they fall within the compartments selected for intensive survey.

p. 191. Special Riparian and Wildlife Areas

MA-8e-03 directs that historical and cultural characteristics be protected through boundary definition and signing. Studies have shown that signing actually increases vandalism of archeological sites. We recommend that sites be recorded and protected, but not marked with signs.

pp. 192-194. Archeological and Historical Areas. Overall, the standards set forth for the protection of cultural resources seem to adequate. However, for some standards, it is not clear who will be taking the lead or when some of these actions are planned. For instance, MA-8f-42 states that the

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FS will acquire private holdings to enhance the value of these special areas and MA-8f-61 states that the FS will negotiate for the purchase of reserved mineral rights to protect cultural resources from the exercise of these rights. We believe that these standards could enhance cultural resources and should be pursued. Will the Forest Archeologist be responsible for initiating these actions through the land acquisition department?

p. 195. The plans to restore the Lake Fannin Organizational Camp to its original state fall along the lines of the on-site discussion held between the FS and SHPO on November 9.

pp. 196-197. The Attoyac Bayou, Ayish Bayou, and Cochino Bayou Archeological Areas. We support the plan to protect these areas from timber practices and mineral extraction that might affects sites. As the Heritage Management Program proceeds, and additional clusters of sites are found along other drainages, similar special management areas should be defined to protect them.

p. 214. Administrative Use Sites.
MA-10a-21 states that an inventory of cultural resources will be completed prior to ground disturbing practices. This statement should be revised to include evaluation of inventoried resources in consultation with the SHPO. Section 106 responsibilities cannot be completed simply by inventorying the resources.

p. 237 (Table 1) Monitoring Questions.
The questions proposed for monitoring implementation, effectiveness, and validation of the Heritage Management Plan are appropriate, but who will be doing the monitoring and how often? The final version of the Heritage Management Plan should specifically address this issue.

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ANDREW SANSOM
Executive Director

December 14, 1994

Mr Alan G Newman
Forest Supervisor
National Forests and Grasslands in Texas
701 North First Street
Lufkin, TX 75901

Dear Mr Newman

This letter responds to the Draft Revised Land and Resource Management Plan for the National Forests & Grasslands in Texas and associated Draft Environmental Impact Statement The Texas Parks and Wildlife Department appreciates the opportunity to review these documents It is evident that the U S Forest Service has expended a large amount of time and effort in compiling the data and information contained in these documents and attached appendices A wide array of resource issues and management scenarios have been identified in an attempt to develop and implement a management plan that will adequately address resource needs and satisfy public demand This Department is encouraged by the Forest Service's efforts toward principles of ecosystem management in the current plan The adoption of a forest-wide vegetation classification and your efforts to develop and refine the Ecological Classification System (ECS) for the National Forests in Texas are commendable Forest management should provide for desired future conditions to mimic habitats that enhance overall ecosystem health Whatever management alternative is ultimately selected, this Department strongly encourages options which will allow flexibility in management so that changes can be adopted as new information from the ECS becomes available Specific concerns and comments relative to development and implementation of the Management Plan are attached

After much discussion with your staff concerning the designation of the Longleaf Ridge as a "National Wildlife and Recreation Area," the following clarification of the Department's position is offered This area should receive special management consideration to achieve the following goals 1) maintain the existence of large core colonies of red-cockaded woodpeckers, 2) enhance the integrity and quality of the occurring longleaf pine-little blue stem vegetation

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series and associated wildlife habitat components, 3) provide allowance for proactive management practices to include prescribed fire, mechanical, and chemical vegetation control; and 4) provide public recreational opportunities to include hunting. When this Department proposed the designation as a "National Wildlife and Recreation Area," it was our understanding that these goals would not be assured unless such a designation was made If the plan can be amended to assure these goals, then this Department would not object to whatever name or management area designation is allocated for these purposes

I want to extend our appreciation to the Service for promptly and graciously responding to our numerous requests for information and meetings for which there have been many We would not have been able to develop this response without this assistance

Sincerely,

Andrew Sansom

Andrew Sansom
Executive Director

AS.RGF dab

Attachments

Attachment

Alternative 4b, the preferred plan by the U S. Forest Service (USFS) appears to possess attributes that achieve a balance between the other currently existing alternatives The plan optimizes management for the red-cockaded woodpecker by allocating approximately 50 percent of the National Forests and Grasslands in Texas to this purpose However, this alternative or any other selected should incorporate the following additional considerations

Prescribed Burning:
Because fire is/was such a driving force to the southern pine ecosystem, prescribed fire should be available as a management tool The USFS needs more fire management flexibility than permitted in the Final Environmental Impact Statement (FEIS) for Vegetation Management in the Coastal Plain/Piedmont published in January, 1989 New concepts concerning ecosystem management have surfaced since this FEIS was written For example, the Vegetation Management FEIS should be amended to allow for greater scorch heights and increased fire frequencies, as well as more latitude in applying growing season burns If fire is to be used as a tool for effectively restoring and maintaining healthy fire climax ecosystems, then they will have to be much hotter than fires of the past For restoration purposes, it is useless to burn unless the fire is hot enough to control living vegetation, rather than just reducing on-the-ground fuels Perhaps there should be a system developed to measure the effectiveness of burns in terms of the desired result, rather than the number of acres burned per year

Also, in order to manage and burn on an ecosystem scale, it will be important to consolidate management units as much as possible This concept should be taken into consideration when trying to purchase or exchange land for the National Forest

With decreasing budgets and personnel limitations, it seems unlikely that the USFS will be able to accomplish the burning projected in this plan The proposed across-the-board burning cycle is not consistent with ecosystem management There are some areas that need annual or biannual burns, others probably every 5 years, others every 10 or 15 years, and some probably never. Some of the hardwood areas can never be winter burned except in exceptionally dry years, perhaps they should be burned then By defining burning cycles by areas or systems, a more reasonable burning work load could be developed

The Department recommends that plowed fire lanes not be utilized unless this is the only method acceptable For example, fire should be allowed to burn into Streamside Management Zones (SMZ's) This approach will produce a much more gradual transition between habitat types, and will not produce sharp ecotones

Management Indicators:
Accomplishment of the monitoring projected in this plan does not appear practical given anticipated budget and human resource limitations If a practical way of monitoring the systems cannot be found, then the indicators and monitoring proposals should be reduced to a reasonable load that the USFS can accomplish. Perhaps a solution would be to establish a statement in the Plan linking the desired management indicators to each respective vegetative group The vegetative group could then be monitored If the vegetative group is providing high quality habitat, then the management indicators should be healthy and thriving

Exotic Species:
More clarification should be provided regarding "desirable exotic species " For example, feral hogs should not be considered desirable The animals are not part of the original ecosystem and are damaging the forest and grasslands in many areas. The Plan or EIS should discuss all the reasons why hogs are or can be a problem and support population control A statement should include the idea that the immigration of neighboring hogs will continue to be problematic without the understanding and help of adjacent landowners and managers The Texas Parks and Wildlife Department has the opportunity to be a helpful influence in this matter Problems with hogs include, but are not limited to destruction of longleaf seedlings and other regenerating forest plants, damage to endangered species in bogs, competition with other wildlife for mast, possible problems with the reproductive success of ground nesting birds, possible disease vectors, damage to wildlife plantings, and damage to ground dwelling vertebrates such as salamanders or toads (some of which are rare or endangered)

The Plan states that grazing of livestock will be prohibited in Candidate Scenic Recreation River Corridors, in Special Riparian and Wildlife areas, and in Scenic areas Research Natural Areas permit grazing of livestock only as part of scientific investigations Grazing of livestock will be discouraged in wilderness areas Are hogs classified as livestock? They are of domestic sources, they graze, and they root Rooting is often more damaging than grazing Since they may be defined as grazing livestock, how are they to be kept out of the restricted areas? They are presently in these areas, or soon will be if their expansion continues

Forest Roads:
Under the current documentation, the mileage breakdown of temporary vs permanent roads and new construction vs old is not clearly defined Without these figures, it is hard to determine what the cumulative impacts will be For example, ORV trails placed too close to a bog could negatively impact the hydrology of the bog, while roads placed near RCW cluster sites could negatively affect the success of nesting during the spring Furthermore, roads have a definite negative impact on snake populations, as observed by the canebrake study conducted by the Southern Forest Experiment Station Perhaps maps should be developed and made available for our review to better assess the impacts of roads to be upgraded If this is not feasible, could road maps be included in the project plans so that they can be evaluated on a case-by-case basis? Where uneven age management is applied, measures should be taken to plan and minimize the amount of entries and number of roads into units

Ponds:
The Department encourages wetland creation or enhancement projects rather than developing small ponds that are not maintained and have little wildlife value

The validity of constructing one pond per management unit is neither conducive to ecosystem management or to enhancing wetland values Constructing ponds scattered throughout compartments without an integrated plan for identifying existing wetlands and determining creation, enhancement or restoration opportunities is a costly and unnecessary practice While water is seldom, if ever, a limiting factor to native wildlife species in east Texas, loss of *functioning wetlands with high value has been significant and considerations for this problem* should be a part of the overall land management plan

Streamside Management Zones:
Discussion in the Revised Land & Resource Management Plan and Draft EIS concerning *streamside management zones (SMZ's) is not clear in regard to implications for protection of* bottomland hardwood forests and riparian vegetation As indicated by the Service, these zones actually encompass the alluvial bottoms associated with 100 year floodplains in addition to vegetation adjacent to perennial and intermittent streams These are the areas identified by the Department's Texas Wetlands Plan and in many situations will exceed the Service's minimum parameters of 66 and 100 feet Additionally, transitional zones between the floodplain areas and uplands serve to protect the integrity of travel corridors Evaluation and selective incorporation of these areas will also reduce effects of habitat fragmentation, and protect the bottomland corridors from disturbance

Snags:
According to discussion during a meeting regarding the Plan on 16 November 1994, the Service *has proposed a management objective of 12 snags/acre to increase populations of some cavity* nesters

Is there a problem with cavity nesters that this density of snags will alleviate? Twelve snags per acre equals about 18 feet of BA Since snags have a maximum standing life of about 10 years (usually much less), how can trees be grown fast enough to replace fallen snags and still produce trees for other uses?

Perhaps there should be a statement about how scattered insect-killed trees are salvaged and therefore how scattered snags are managed The practice of late is to leave scattered pine snags This is proper except during strong southern pine beetle years During the hot portions of the southern pine beetle cycle, single infested trees should be removed But during the cooler *portion of the beetle cycle, single infested . killed trees should be left standing Can this be* incorporated as a guide?

Old Growth:
Because of past and proposed management guides for red-cockaded woodpecker, bottomlands, streamside management zones, wilderness, and the 1/4 mile wild and scenic river corridor, many forest stands will be allowed to progress and increase toward old growth status Development of old growth forests should be optimized in the selected alternative, while keeping the management flexibility to address specific needs of individual stands As correctly stated in the summary, allowances for old growth will likely have adverse effects on commodity production *in the short term, but will increase long-term productivity, overall species richness and viability* of less common plant and animal species The importance of including provisions for old growth in forest management has been stated in previous correspondence by this Department Old growth or older growth is currently adequately identified in the computer data base As older stands occur and are located during field surveys, this data base should be updated The *plan should also include provisions for updating the public on where old growth stands are* located without referring to a data base Additionally, the Plan should better reference the 100,000± acres that will be coming into the old-growth category (or 100± years)

Preferred Silvicultural Methods
Appendix J of the EIS identifies three silvicultural systems for managing forests, the even-aged, two-aged, and uneven-aged systems and their associated regeneration methods Each has been *shown to have benefits as well as limitations relative to particular goals This Department* supports using whatever available silvicultural methods best achieve the identified management goals for each of the 11 major land allocations The U S Forest Service is obligated to address resource management issues that will require management considerations ranging from broadly based ecosystem and plant community management to site specific treatment of specific stands, and specific species These management needs will require the potential use of all available tools The degree of acceptability or usefulness of each of the three methods will be determined on the precise delineation of the management goal and related objectives

Uneven-aged management has caught much attention because of its appearance and the notion that it is more natural However, making it work in the presence of fire and hardwoods will require untried modifications to the system There is concern that the public, wildlife biologists, *and the USFS will not be satisfied with the results of such an attempt*

Another limitation with uneven-aged management is the extreme difficulty of conducting prescribed burning while producing or maintaining regeneration It will be very difficult, if not impossible to burn effectively and still achieve adequate regeneration under an uneven aged management regime This should be taken into account when prescribing regeneration cuts to management units Perhaps irregular shelterwood would better achieve desired regeneration while maintaining the ecosystem in the most natural manner. The red-cockaded woodpecker, Bachman's sparrow, Louisiana pine snake, Texas trailing phlox, and many other T&E or rare species have been directly impacted by fire suppression The only way these species will be recovered is through an effective burning regime Herbicides will control woody vegetation, but will not restore the native grasses, forbs, and herbaceous vegetation that were once such an *important component of the Pineywoods ecosystem*

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Improved Seedlings:
It is a good policy to have some genetically improved stands scattered throughout the forests, depending on particular genetic selection goals This does not infer use of non-native species The vigor of these stands may be greater than many of the degraded "natural stands" whose gene bank came from a few trees along a fence or trees escaping the saw because of phenotypic inferiority

Wilderness:
The Department recommends that prescribed fire be implemented in wilderness areas It is also strongly recommended that the Regional Directive be amended to allow for southern pine beetle control within these areas Southern pine beetle impacts have been dramatic and detrimental to both the wilderness areas and adjacent private lands

Regeneration:
The pine regeneration figures for loblolly and shortleaf pine are too high A total of 300 to 400 well spaced seedlings should be enough to adequately regenerate most sites to a pine or pine dominated stand A density of 600 to 900 seedlings limits the production of herbaceous and shrub vegetation that many wildlife species depend on The Department recommends that the *previous guidelines contained in the FEIS for Vegetation Management in Coastal Plain/Piedmont* be amended to allow for a reduction in pine density

Miscellaneous Comments:
Draft Plan, page 124, MA-4-12 Maintain existing plant communities
This should be clarified For example, if burning is conducted effectively in longleaf management units, then the baygalls enclosed within will shrink Is this consistent with the overall goal? Perhaps the standard should be stated as, "Restore and maintain existing plant communities "

Draft Plan, page 91, Rotation Age and Diameter Guidelines Table
The diameter limits presented will not match the ages needed to attain "old-growth " They also make the use of fire essentially ineffective

Mineral Recovery:
The forest wide standards for aesthetics should state that oil and gas structures should be placed in previously cleared or disturbed areas and as close to roads as possible in order to minimize impacts and fragmentation

Heritage Sites.
In appendix B, page 84 of the EIS, there should be explanation that the Plan will manage inclusions such as the Heritage sites as separate from the entire compartment, and will treat them accordingly

Trinity River Authority of Texas

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December 6, 1994

Alan S Newman, Forest Supervisor
National Forests and
Grasslands in Texas
701 N 1st Street
Lufkin, Texas 75901

Re: Draft EIS - Land and Resource Management Plan

Dear Mr. Newman:

The subject document has been received and reviewed Though it does not give the exact location of affected tracts or any detail on impacts on water, it appears that all alternatives try to minimize erosion or other disturbances, *none would be worse than present conditions*, and the leading alternatives would be similar

Sincerely,

RICHARD M BROWNING
Senior Manager
Planning & Environmental
Management Division

RMB/ls

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NATIONAL PARK SERVICE
Big Thicket National Preserve
3785 Milam
Beaumont Texas 77701

IN REPLY REFER TO

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December 14, 1994

Alan G Newman
Forest Supervisor
National Forests and Grasslands in Texas
701 North First Street
Lufkin, Texas 75901

Dear Mr ~~Newman~~ Alan

We appreciate the opportunity to comment upon the U.S. Forest Service "Draft Land and Resource Management Plan" and "Draft Environmental Impact Statement " The wealth of information summarized in the documents is a testament to the complex issues the U S Forest Service faces in attempting to satisfy many public demands upon the resources of the National Forests and Grasslands in Texas Overall, the preferred alternative presented in the Plan represents an earnest attempt to integrate traditional multiple-use activities with other resource values of the lands in your stewardship In this regard, the Plan shows promise for establishing ecosystem-based management The comments of members of the resource management staff at Big Thicket National Preserve are summarized below

We realize that the preferred alternative would have short-term impacts upon local economies that are driven by forest product industries and livestock production However, the establishment of desired future conditions for the forests and rangelands, and the use of increasingly more creative approaches to achieve those conditions would assure the long-term sustainability of natural resources The Forest Service should make every available effort to educate the public about desired future conditions in its implementation of the preferred alternative In addition, attempts should be made to identify and promote other non-traditional, sustainable economic uses

The implementation of the preferred alternative would have indirect beneficial impacts upon the natural resources within Big Thicket National Preserve. The Plan proposes to more effectively protect stream quality in the Upper Neches and Angelina River Basins by expanding the use of streamside protection zones, establishing recreational river corridors, and evaluating streams for inclusion in the National Wild and Scenic Rivers System. While many impacts to stream quality are ameliorated within Lake

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Sam Rayburn and Lake Steinhagen, any measures to improve water quality in the Neches River would benefit the aquatic and wetland ecosystem components within the Neches River Corridor Units of Big Thicket National Preserve In addition, the implementation of proposed forest management techniques to restore and protect forest diversity would have beneficial effects upon those wildlife species (including endangered species) which mutually use resources within Forest Service and Park Service boundaries as they migrate through East Texas

We are impressed by the emphasis on protecting biological diversity The use of the Ecological Classification System, the Management Indicators Table, and the identified Desired Future Conditions appear to be a more effective system for characterizing the range of ecosystem components than have previous systems The designation of Research Natural Areas and Botanical Areas to protect unique resources, and utilization of research results to better understand the implications of management practices upon the full complement of biological components would enable managers to adapt management strategies if changes are needed We suspect, however, that some of the areas proposed for inclusion in protected zones should be enlarged in order to enhance their effectiveness and sustainability over longer periods of time

The proposed use of forest management practices to restore hardwood components and to enhance stand structural and age class diversity would also help sustain the irreplaceable plant and wildlife communities that are unique to East Texas In addition, the implementation of other restrictions, including excluding logging skids from certain areas, reducing the number of stream crossings during logging operations, protecting turkey roost areas, and retaining snags and hardwood den trees would contribute to these management objectives

While we understand the reasons that large portions of the National Forests are dedicated to managing for the endangered red-cockaded woodpecker, we encourage the Forest Service to work with the U S Fish and Wildlife Service to broaden its objectives to instead manage for dwindling long leaf pine-little bluestem upland forests The shift in emphasis to provide long-term availability and maintenance of this habitat type would not only enhance the chances of survival for the red-cockaded woodpecker, but also for many other exceedingly rare plant and animal species The proposed increase in use of prescribed fire, and the shift to planning summer season burns are effective measures to restore and maintain these habitats, as the National Park Service has learned while managing for the same objectives at Big Thicket National Preserve

We note that proposed changes in management of off-road vehicles would also enhance the protection of many plant and wildlife species and stream quality Instead of designating areas for unlimited off-road access, detrimental impacts to the flora,

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fauna, soils, and water quality could be minimized by instead establishing a system of trails If necessary, additional routes could be established in adjacent areas

Overall, the draft Plan and preferred alternative represent an attempt to derive consensus from a conflicting array of needs and desires of many public constituencies The flexibility that is built into the Plan is needed in order to allow changes in management as the effects of current approaches are assessed through planned research

Again, I thank you for the opportunity to comment upon the Draft Plan The National Park Service would gladly cooperate with the U S Forest Service and other land management entities to develop and implement multi-agency approaches devoted to specific issues in sustainable ecosystem management If you or any member of your staff wish to further discuss these comments, please contact Ricky Maxey or Rick Strahan at (409) 839-2690

Sincerely,

Ronald R. Switzer

Ronald R. Switzer
Superintendent

409/598 3863
Fax 409/598 3146

Floyd A. "Dock" Watson
COUNTY JUDGE - SHELBY COUNTY
200 San Augustine St.,
Center, Texas 75935

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December 14, 1994

Ernie Smith, Area Ranger
National Forests and Grasslands in Texas
701 North First Street
Lufkin, Texas 75904

Dear Mr. Smith:

I would like to endorse Alternative 2 of the Draft Environmental Impact Statement for the Revised Land and Resource Management Plan dated September, 1994. This is the best plan for Shelby County of the other alternatives available I would hope that we would be more interested in regeneration and reforestation than the habitats which would come naturally with the right cover.

I think the management of National Forest Lands could be managed best by local or area needs rather than national edicts. Most of these changes could be handled in a more economical manner than those required on a national level.

We support you in your efforts to improve the marketable timber in Shelby and surrounding counties and if we can be of further service, please feel free to call on us.

Sincerely,

Floyd A. Watson

Floyd A. Watson
County Judge
Shelby County

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Post Office Box 649
Albuquerque, New Mexico 87103

ER 94/755

December 19, 1994

Robert Joslin
Regional Forester, Southern Region
1720 Peachtree Road NW Suite 951
Atlanta, Georgia 30367-9102

Dear Mr Joslin

The U.S Department of the Interior has reviewed the draft Environmental Impact Statement (EIS) and the Revised Land and Resource Management Plan for the National Forests and Grasslands in Texas The following comments are provided for your consideration in preparing the final document

GENERAL COMMENTS

National grassland management provides for water, forage, wildlife habitat, recreation, and minerals The preferred alternative provides a mix of amenity and commodity output, recognizing urban users' needs and values Activities include grazing, oil and gas drilling and production, outdoor recreation, and native habitat restoration.

In all alternatives evaluated, grazing activity on the grasslands is expected to remain constant or just below current levels, however, an increase in developed and dispersed recreational opportunities is anticipated We believe livestock grazing on the grasslands, as proposed, fails to account for species and habitat incompatible with continued pressure from domestic livestock For example, the woodland and bottomland components on the Caddo and LBJ National Grasslands are not as suitable for grazing as native grasslands and improved pastures It is estimated that half of the avian species recorded are dependent upon grassland habitat and half are dependent on other habitat types, including water, riparian areas, woodlands, and bottomland hardwoods Deemphasizing livestock grazing in these areas should be considered

Alternatives 2 through 7 are consistent with the currently proposed U S Forest Service *direction to incorporate red-cockaded woodpecker (Picoides borealis)* (RCW) management into the individual Forest Plans on the 11 National forests in the Southern Region with RCW populations Alternative 1, the no-action alternative, would continue to manage the National forests in Texas under the court-ordered management plan for 1,200 meter zones for active and inactive RCW clusters Alternative 1 will not support the RCW in the long term, because it only requires management of existing active and inactive clusters and not adjacent habitat or habitat between demographically isolated clusters Alternative 1 also lacks adequate regeneration methods for harvesting timber which are expected to provide for a continual flow of mature pine trees required by the RCW for nesting and roosting

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We support implementation of the preferred Alternative, 4b, as it relates to RCW management and establishment of RCW Habitat Management Areas (HMA's) This alternative provides sufficient habitat to recover the RCW in the coastal plain of east Texas Establishment and *management of the mature pine forest, preferred by the RCW, are expected to provide habitat* for an additional 189 Federally-listed species (and several unlisted species) dependent on the mature pine forest Alternative 4b proposes to establish and manage the second largest amount (71,268 acres) of the rare longleaf-pine/little bluestem plant community This Alternative includes provisions for identifying (through use of a biologically sound ecological classification system) and managing ecosystems in the National forests of Texas

Alternative 4b also emphasizes developed recreational opportunities, particularly off-road vehicle (ORV) uses, and mineral leasing on greater than half (398,500 of the 637,000 acres) of the National forests in Texas This Alternative proposes to build 250 miles of ORV trails on the Sam Houston and Angelina National Forests and will include a total of 355 miles on the four National forests combined (more than any of the other alternatives) The Sam Houston National Forest currently supports recovery of the RCW population However, the impact to the RCW population on the National forests from development and use of such a large number of ORV trails is unknown and may negatively impact this species We recommend a reduction in the number of ORV trails by at least half of the proposed amount, and that a study of the impacts of ORV use on the RCW be conducted

To date the U.S Forest Service has not determined the cumulative impacts of past, present, and future oil and gas exploration and developments on the RCW, the rare plant communities, particularly the longleaf-pine/little bluestem community, and on the interior forests in each of the National forests in Texas In order to be in compliance with the National Environmental Policy Act, it is recommended that these impacts be determined, particularly on the Yellowpine Ranger District of the Sabine National Forest, which has undergone extensive oil and gas developments during the past 3 years, and the Angelina National Forest, for which several oil wells are proposed in and adjacent to RCW and bald eagle (*Haliaeetus leucocephalus*) habitat. The findings of the study can then be used to evaluate the extent of future oil and gas activities in the National forests Cumulative impacts can be determined by calculating the amount of acres of pine, pine/hardwood, and bottomland hardwood stands existing before and after oil and gas activities (from timber stand data), and the acres proposed to be harvested for oil and gas activities (information is included in the draft EIS, Appendix C) on Federal, State, and private lands adjacent to the National forests

The "*desired future condition*" (in approximate number of acres) for each plant community and ecosystem should be determined in order to calculate the number of available acres for future oil and gas activities Alternative 4b, which specifies moderate to high commodity production and low recreation and wildlife management, places a higher priority on mineral leasing in the National forests in Texas than ecosystems management This Alternative states that "*two-thirds of the forest would be set aside for the RCW*" (338,637 acres) It appears that the preferred alternative would concentrate mineral leasing on the remainder of the forests (398,500 acres, except in wilderness areas) We are concerned that this management strategy emphasizes mineral leasing to replace lost timber revenue resulting from RCW management The draft EIS (page 50, issues 14 and 15) states that "*the mineral activity with the greatest potential impact to other resources and to the human environment is in the area of oil and gas development.*" Implementing this strategy may lead to the same destination

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that past emphasis on timber harvesting has, specifically, the further loss in the amount and quality of the mature forest ecosystem and its associated Federally-listed species. We believe this strategy should be modified and evaluated in regard to the cumulative impacts from past, present, and proposed activities

To date, the National forests in Texas lack information regarding the location, status, and habitat requirements of several Federally-listed species Fragmentation of forest stands from high commodity production is more likely to negatively impact the RCW, other Federally-listed species, and the integrity of forest ecosystems than the projected amount of forest loss (although total forest loss of plant communities has not been determined) We recommend the National forests in Texas continue to locate wells and pipeline right-of-ways in existing openings and to locate these facilities along major roadways The U S Forest Service, historically, has located wells further into the forest to maintain the visual quality along roadways However, we believe it is more important to reduce forest fragmentation than to maintain visual quality

SPECIFIC COMMENTS

Issue 1 Biodiversity, Old Growth, page 29 Alternatives 4, 4a, and 4b propose to locate old growth forests in wilderness areas, special areas, riparian areas, and the 1/4-mile zone around RCW clusters RCW habitat should not be considered old-growth habitat because, unlike wilderness and special areas, it receives intensive hardwood midstory removal. Additionally, if the U S Forest Service plans to manage ecosystems, it is important to establish contiguous old-growth forests This may be accomplished by designating old- growth forest corridors between riparian, special areas, and wilderness areas It is recommended that the standard for MA-1 and MA-2 regarding old growth be rewritten to allocate old-growth corridors through RCW habitat management areas if necessary

Issue 10, Recreation, page 37 For the preferred alternative "*five additional recreation sites are proposed on the forest* " Many of the developed recreation sites are currently under utilized In many areas camping loops or entire areas are closed due to nonuse Additional developed areas would serve to decrease the habitat for some wildlife species; in this regard, we recommend that funds be utilized to improve existing developed recreational areas instead of creating more

Issue 11, Resource Sustainability, Range Management/Grazing, page 39 The no-action approach provides approximately 38,000 acres for grazing on the National grasslands, " *management emphasis will continue at approximate current levels* " Total National grassland acreage is 38,100 with an estimated 3,800 acres in bottomland hardwoods, over 9,000 acres in prairie-savanna woodlands, and more than 19,000 acres in prairie grasslands Proper range management with grazing as one of many management tools is important for the restoration of native grassland habitat beneficial to endemic and migratory wildlife species However, grazing in bottomland hardwood areas may degrade habitat essential for Federal trust species

Issue 15, Lands, page 43 Issue 15 is very general and could use a better discussion of the U S Forest Service's land acquisition goals It would also be helpful if there were maps or tables describing the location of proposed land acquisitions

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Issue 2, Vegetation Manipulation, page 45. Alternative 4b proposes to "*prescribe burn*" more acres of National forest land than any of the other alternatives. We support this proposal based on the fact that fire is a critical component in fire-dependant ecosystems. However, it is recommended that no restriction be placed on the time interval for conducting prescribed burning (i e , the 2 to 5 years specified in the draft EIS) More frequent fires may be necessary to convert vegetational communities to the longleaf-pine/little bluestem community.

Issue 8, Community Stability, page 48 This section makes the statement that "*Grazing receipts from permittees on the Caddo and LBJ National Grasslands is [are] greatest in Alternatives 1, 2, and 3 and lower in Alternatives 4 through 7, however, this difference is minimal and may be offset by the increase in recreational opportunities in Alternatives 4 through 7* " However, on page 36 under the Community Stability section, it states that "*Grazing remains consistent to current levels on the Grasslands* " Developed recreational facilities, shooting ranges, and special interest areas should decrease available grazing acreage

Affected Environment and Environmental Consequences, page 52 It is stated, "*The effects of alternatives are disclosed with the mitigating measures in place* " In relation to fish and wildlife impacts, the first step in mitigation involves avoidance If impacts cannot be avoided, they should be minimized to the extent possible and unavoidable impacts should be mitigated to restore lost habitat values resulting from a project

Grassland Grazing and Range Management, page 68 This section states, "*The Caddo and LBJ grasslands have a mix of bottomland hardwoods (10 percent), prairie-savanna woodlands (25-35 percent), and prairie grasslands (50-60 percent)* " According to these figures, the grasslands comprise approximately 3,800 acres of bottomland hardwoods Livestock grazing has the potential to degrade wildlife habitat in bottomland hardwood areas through the removal of forbs, shrubs, and regeneration of hardwoods

Grassland Grazing and Range Management, page 69 It is stated, "*It is anticipated that most acreage on the Grasslands would be available for permitted grazing in every alternative, with the exception of special management areas and developed recreation sites Allotments with a recreational emphasis would not prohibit grazing; however, this emphasis could reduce some use (season of use or intensity of grazing) on the allotment on a site specific basis.*" We believe that livestock grazing in bottomland hardwood areas (approximately 3,800 acres) should be limited and evaluated in regard to compatibility with wildlife resources. Limited grazing may have no impact, however, exclusion areas should be developed, monitored, and utilized as a basis for future management decisions in bottomland hardwood areas

Game Species, Affected Environment-Forests and Grasslands, page 92 The importance of increasing the flow of water to the fisheries resource needs to be explained, as well as including information on seasonal flow regimes and how they will be impacted by the proposed alternatives

Part II(a), Soil Productivity, pages 117-119, and Part II(b), Soil Productivity, pages 165-166 The discussion that soil productivity is low in the National forests and grasslands in Texas is misleading Soils in these areas are naturally low in potassium and phosphorus, except in bogs and some riparian areas This discussion leads the reader to believe that forest

management practices will not affect the soils in the National forests and grasslands in Texas because they are already low in productivity In fact, timber harvesting continues to reduce soil productivity because the nutrients which are tied up in the trees have been removed, therefore, these trees can no longer contribute to the leaf litter and subsequent detritus build up in the soil and nutrients required by aquatic organisms This section should be rewritten to reflect the correct perspective

Part II(a), Environmental Consequences of the Alternatives, Land Uses, page 126 This section states, " *valid existing rights may override management objectives* " to grant land use authorization permits A statement should be included here to clarify that endangered species' concerns may take precedence over granting some of these land use permits, an example may be when these authorizations involve a "take" of an endangered or threatened species

Part II(a), Operation and Maintenance of Roads, Environmental Consequences of the Alternatives (Road Development), pages 128-130 This section of the draft EIS does not specify what the actual density (per acre or per square mile) and location of roads are on the *National forests in Texas The U S Forest Service in Texas has stated that they plan to map* these roads when their Geographic Information System for this project is installed The draft EIS should state that this activity is planned and that the information will be available to *Federal and State agencies and the private sector The draft EIS does not include all impacts* to the environment from road reconstruction and construction, only impacts to soil and water It is recommended that the EIS address the impacts of roads fragmented throughout the forest *ecosystems*

The Physical Environment, Part II(b), Alternative 4(b), page 155. Due to RCW concerns, *available oil and gas activities " will have fewer acres available for surface occupancy."* These activities " *could effect* " RCW's during the nesting season and ". *may need to be relocated to SPB* (southern pine beetle) *spots or storm damage areas to avoid damaging additional openings* " In all cases, the method which causes the least amount of environmental impacts should be utilized Any action which may affect any Federally-listed threatened or endangered species should be avoided Otherwise, section 7 of the Endangered Species Act requires formal consultation with the U.S Fish and Wildlife Service (FWS)

Glossary, page 235 The definition for filter strip should include a minimum width of relatively undisturbed vegetation to be retained The silvicultural forestwide standard (FW-171-23) in the Draft Revised Land and Resource Management Plan, chapter IV, page 79, states that the filter " *strip's width in feet is at least 30 plus 1 5 times the percent slope* " The definition should be consistent with this standard

Appendix D, Winters Bayou, pages 250-264 Alternative 4b does not include provisions to increase the amount of wilderness acreage It is recommended that the U S Forest Service consider adding Winters Bayou on the Sam Houston National Forest as a wilderness area This area supports the rare and declining mature bottomland hardwood ecosystem in east Texas We agree with the use of prescribed fire in Winters Bayou and in existing wilderness areas, as specified in alternatives 2 through 5 Designation of some of the other proposed *wilderness areas (i e , Longleaf Ridge and Jordan Creeks) would conflict with designation and* management of proposed RCW HMA's

Appendix E, Wild and Scenic Rivers, page 2 In order that inherent values may be protected and managed, we support designation of the two segments of the Neches River, identified in the draft EIS, as a National Wild and Scenic River to be included in the National Wild and Scenic River System of Waterways

Appendix I, pages 1-15 The "*desired future condition*" regarding snags and dead and down trees for each of the forest types listed in the Appendix, includes a statement that "*The high temperature and humidity in east Texas and the recurrent fires prevent large build-ups of snags or down material over large areas* " The lack of snags and dead and down material in the National forests in Texas is primarily the result of prescribed burning programs which have not included provisions to protect this important forest component. Several listed candidate species (Rafinesque's big-eared bat, *Plecotus rafinesquii*, Southeastern myotis, *Myotis austroriparius*, and the Louisiana pine snake, *Pituophis melanoleucus ruthveni*) and the U S. Forest Service's secondary cavity nesting species, depend on snags and dead and down material to meet their habitat requirements. Recent ongoing research indicates that very few of these species inhabit the National forests (and other Federal and State locations) in east Texas We recommend increasing the current number of snags (0 to approximately 6/acre) and dead and down material/acre (unknown amount) in these National forests by requiring protection of these forest components in the prescribed burning program Research conducted by Evans and Connor (1979)[1], indicated that 12 snags/acre are required to provide *suitable habitat for secondary cavity nesters in southern forests*

DRAFT REVISED LAND AND RESOURCE MANAGEMENT PLAN

General Comments

Language in the standards and guidelines for Management Areas 1 and 2 need to be changed to reflect changes that will be made in the final EIS for management of the red-cockaded woodpecker (RCW) and its habitat on National forests in the southern Region

Specific Comments

Chapter II, Integrated Pest Management (IPM) Issue, page 11 New techniques, using behavioral chemicals, to control *southern-pine beetle (SPB) infestations are being studied and* have been successful SPB infestations have destroyed a significant number of RCW cavity trees in the National forests in Texas (154 cavity trees were killed from 1990 to 1993). Use of these techniques, which are currently awaiting Environmental Protection Agency approval, should reduce the number of cavity trees lost to SPB It is recommended that a forest-wide standard and guideline be developed in the Management Plan and in each of the management areas to adopt these new techniques after they are approved and an amendment is made in the EIS for the suppression of the southern-pine beetle in the Southern Region

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[1] Evans, K E and Connor, R N. 1979 Snag management. Pages 214-225 in Management of Northcentral and Northeastern Forests for Neotropical Birds, compiled by R.M. DeGraaf and K Evans USDA Forest Service. GTR NC-55

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Chapter III, Current Research Needs, 1. Habitat requirements and ecosystem function, page 36
A review of the current research needs suggests that the science of ecosystems management is relatively new, local ecological classification types have not been completed for the National forests in Texas, and there is a lack of knowledge regarding occurrence and habitat requirements of Federally-listed species Therefore, standards should be developed (for each management area) which allow amendments in species and habitat management as new information is obtained from species surveys and ecological classification identification

Chapter IV, Desired Future Condition, page 44 While we agree that examples of natural succession on forest and grassland ecosystems will be demonstrated through more areas that are managed for special attributes, we are concerned that these may become the only areas within which ecosystems management will be implemented The concept of a forestwide ecosystems management plan should be sincerely put into practice

Chapter IV, Desired Future Condition, page 45 Language in the draft EIS provides for allowing development of oil and gas wells along major travelways To reflect this in this section of the Management Plan, the statement regarding scenery along major travelways should be revised to read, "Scenery along most of the major travelways, lake shores, and river corridors will develop and maintain a variety of scenic qualities, including some areas with an older-forest character " It is further recommended that a statement in MA 1-62 and MA 2-62 be developed to include that well sites and associated facility locations may be placed in major roadways to reduce forest fragmentation

Chapter IV, Management Objectives, page 48 We recommend adding the following phrase to statement 3(k), " and when Federally-listed threatened and/or endangered species will continue to be protected according to the Endangered Species Act " We also suggest changing the statement 4(d) to read, "Provide high quality pine and hardwood saw-timber and other forest products " Additionally, we question whether or not it will be feasible to supply a continual flow of high quality pine and hardwood products

MA-1, Standards and Guidelines, Silvicultural Management, page 91. The diameter limits listed for scheduled regeneration cuttings are inconsistent with those in the draft EIS for the management of the RCW and its habitat on National forests in the Southern Region Smaller diameter limits are acceptable if uneven-aged management is implemented, however, larger diameters are required when irregular shelterwood is used Irregular shelterwood leaves older trees with larger diameters and these trees produce higher quality seed sources Therefore, we recommend the diameter limits be increased to reflect those in the draft RCW EIS

MA-1, Standards and Guidelines, Facilities, page 100 We recommend changing the statement in MA-2-16 to include language for forest fragmentation, i e , "Restrictions may be implemented in response to resource programs, such as wildlife, forest fragmentation, recreation, "

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MA-2, Standards and Guidelines, pages 99-111. Currently, the RCW recovery population for the coastal plain of east Texas has been identified by the U.S. Forest Service and the FWS as the population on the Sam Houston National Forest. This population primarily inhabits the loblolly and shortleaf pine/hardwood forests in this National forest. The proposed Revised Land and Resource Management Plan includes provisions to restore the longleaf-pine forest, which is the preferred habitat of the RCW. In the event the RCW population expands in the longleaf-pine forest (on the Angelina or Sabine National Forests) and exceeds that of the Sam Houston population, the U.S. Forest Service may want to redesignate the recovery population to these forests The Sam Houston National Forest is proposed to be designated as an urban forest because of its close proximity to Houston, Texas. The demand for recreation (especially ORV trails), which is expected to increase, may conflict with management and recovery of the RCW on this forest It is, therefore, recommended that a standard be included in MA-2 which allows for reconsideration of the location of the RCW recovery population in east Texas

Chapter V, Table 2, page 241 Table 2 should be corrected to remove the dwarf salamander from the list for the "Longleaf-pine Woodlands & Savannas" and include the pileated woodpecker (*Dryocopus pileatus*) in the "Bottomlands Streamsides" category Neotropical and breeding birds identified by the U S Forest Service in their proposed "Landbird Strategy" (The Southern National Forest's Migratory and Resident Landbird Conservation Strategy) should be added to the management indicator list Proposed surveys for these species should provide information for monitoring the health of the forest We support the "Landbird Strategy" in view of the lack of data on the occurrence and habitat requirements of both neotropical and breeding birds in east Texas However, we are concerned that implementation of this strategy (i e , available time of the district biologists) may replace management of Federally-listed species and other ongoing research projects in these National forests

As a general observation, forest management indicator species have historically been used to evaluate the health of forest ecosystems If the U S. Forest Service plans to manage ecosystems, it may be more effective to continue to identify and monitor the status of the "Desired Future Condition" of ecosystems (i.e , acres of forested habitat restored, acres in each plant community) in the National forests, rather than look at individual or even groups of species We therefore recommend using the Habitat Evaluation Procedures developed by the FWS for species which have been identified as management indicators in the various plant communities

Appendix D, Endangered, Threatened and Sensitive Species, pages 1-6. This appendix contains some inaccurate information which should be corrected The mountain plover (*Charadrius montanus*) is a Category 1 candidate species which should be added to the list This species is an incidental visitor to north Texas which may occur on the grasslands during migration The correct Federal status of the Louisiana black bear (*Ursus americanus luteolus*) is threatened. Appendix D lists this species as a Category 2 candidate species. Additionally, the American burying beetle (*Nicrophorus americanus*) is listed on page 4 of the Appendix This species has not been documented in Texas and should be deleted from this list

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SUMMARY COMMENTS

The U S Forest Service is commended on the development of an ecosystem approach for managing the National forests and grasslands in Texas, as well as throughout the United States. Implementation of the preferred alternative and incorporation of the general and specific comments provided herein should restore the mature forest ecosystems in the National forests in Texas

The bottomland hardwood areas which comprise approximately 10 percent of the total acreage of the National grasslands should be evaluated as a special management area Limiting or restricting grazing in these areas should be considered Prairie restoration through the removal of improved pasture and invader species, such as cedar and hackberry, and establishment of native grasses are encouraged Oil and gas exploration and production, which permanently impacts the least amount of grassland habitat, are desired, with impacts to streams, riparian vegetation, and bottomland hardwoods avoided Developed and dispersed recreational opportunities are important due to the proximity of the National grasslands to the Dallas/Fort Worth metropolitan area, but should not be emphasized over wildlife habitat management Habitat management, which provides requisites important for endemic and migratory wildlife species, should be given equal or greater consideration

Delineation of RCW Habitat Management Areas is expected to recover the Federally-listed RCW in the coastal plain of east Texas, as well as provide habitat for several listed (and unlisted) species The recent U S. Forest Service directive to survey National forests for two Federally-listed candidate species per year should provide us with much needed information for upgrading or delisting these species However, a management standard needs to be developed to include this new directive into the EIS and Revised Land and Resource Management Plan for the National forests in Texas

The preferred alternative emphasizes developed recreational opportunities, particularly ORV use, and mineral leasing on greater than half of the National forests in Texas We recommend that the number of proposed ORV trails in the draft plan be reduced to avoid impacts to the RCW recovery population on the Sam Houston National Forest Alternatively, the U S. Forest Service may want to redesignate the RCW recovery population to a different National forest The revised Land and Resource Management Plan includes provisions to restore the longleaf-pine forest, which is the preferred habitat of the RCW. In the event the RCW population expands into Angelina, Davy Crockett, and Sabine National Forests, and exceeds that of the Sam Houston population, the U S Forest Service may want to redesignate the recovery population to one of these forests We are also concerned that the proposed alternative, which places a high priority on mineral leasing, may result in further loss in the amount and quality of the mature forest ecosystem and its associated Federally-listed species Forest fragmentation from high commodity production is more likely to negatively impact listed species than the projected amount of forest loss in the draft EIS We believe this strategy should be modified and evaluated in regard to the cumulative impacts from past, present, and proposed future activities

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We appreciate the opportunity to review these documents We trust these comments will be of use during final document development

Sincerely,

Glenn B Sekavec
Regional Environmental Officer

DEPARTMENT OF THE ARMY
FORT WORTH DISTRICT CORPS OF ENGINEERS
P O BOX 17300
FORT WORTH, TEXAS 76102-0300

REPLY TO
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January 6, 1995

Planning Division

Mr Alan G Newman, Forest Supervisor
National Forests & Grasslands in Texas
701 N First Street
Lufkin, Texas 75901

Dear Mr Newman

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the U. S Forest Service's proposed Revised Land and Resource Management Plan, National Forests and Grasslands in Texas, dated September, 1994 This project has been assigned Project Number 199400676 Please include this number in future correspondence concerning this project

We have reviewed this Draft EIS relative to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899 Under Section 404, the U S Army Corps of Engineers (USACE) regulates the discharge of dredged and fill material into waters of the United States, including wetlands Waters of the United States include any part of the surface water tributary system, from large rivers to small streams, and any lake, pond, or other waterbody on the tributary system, as well as wetlands Waters of the United States can include man-made as well as natural areas For example, abandoned construction and mining pits may be waters of the United States

Our responsibility under Section 10 is to regulate any work in, or affecting, navigable waters of the United States. The Sam Houston, Angelina, and Sabine national forests border navigable waters of the United States Enclosed for your information is a list of navigable waters of the United States in the Fort Worth District Any of the above discharges or work may require Department of the Army authorization in the form of a permit

Due to the general nature of the activities included in the proposed land and resource management plan, we are unable to determine from the Draft EIS whether Department of the Army authorization would be required However, several types of activities discussed in the Draft EIS may require authorization

if they occur in waters of the United States, including wetlands Examples of ground-disturbing activities that may require authorization where they occur in waters of the United States include, but are not limited to, some timber harvesting and related timber management activities that are not part of an established operation; construction of roads, trails, and recreational facilities, construction of oil and gas exploration wells, access roads, and production facilities, and excavation of sand, gravel, and rock

When a specific project that would require Department of the Army authorization is proposed, please contact our office and provide us with the details of the proposed work, including the type and amount of material, if any, to be discharged (both temporary and permanent discharges) into waters of the United States, the location of any work or discharges, and appropriate plan and cross-section views of the proposed work. We understand that in many cases the U S Forest Service would not be the party responsible for obtaining Department of the Army authorization In these cases, we would encourage you to inform those coming to you for permits and/or information that they may need to contact the USACE regarding authorization under Section 404 and/or Section 10.

Thank you for your interest in our nation's water resources If you have any questions concerning our regulatory program, please contact Mr David Martin the address above or telephone (817) 334-4625

Sincerely,

Paul M Hathorn

Paul M Hathorn
Chief, Environmental Resources Branch

no enclosure

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