

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

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1996

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

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

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

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

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

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

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

925	Bonnie Howe	992	C.N. Adams
926	Elizabeth Weston	993	Ramon McKinney
927	Cheri H. Urban	994	Marty Howell
928	Rex L. Bavousett	995	Harvey Natevrn
929	Richard Bryarly, Jr.	996	Wanda Henao
930	Julia M. Bednar	997	Rue Lynn Allen
931	Kevin Johnson	998	Robert O. Scott
932	David Marsh	999	Christopher S. Everett
933	D. Levi	1000	Janice Withers
934	Juan Navarro	1001	Gail S. Cely
935	Bettye Gardner	1002	Arthur E. Travis Jr.
936	Paulette L. Cleveland	1003	Mike Stepchiski
937	Betty B. Kirby	1004	Edward Ramirez
938	Bechir Abbassi	1005	Loren Fleckenstein
939	Bob Dale	1006	James K. Garde
940	Mychele Lord	1007	Diann Walker
941	Judith D. Creasy	1008	Richard Fowler
942	Johathan Roman	1009	Tommey S. Conwey
943	Nidhi Trehan	1010	Martha Ford
944	Walter Wikes	1011	James Ruggerio
945	Jamie P. Smith	1012	Raj Sinkar
946	Michael Strong	1013	Linda Hankins
947	Mark School	1014	James R. Dean
948	Catherine Curby	1015	Mary Lou Fry
949	Ola B. Humphries	1016	Jacqueline Bassett
950	Maria C. Richards	1017	Jonathan Carrell
951	Beverly McLaughlin	1018	Mark Schumacher
952	Luean Anthony	1019	N. Susan Stone
953	Georjean Sherriff	1020	David Matthiesin
954	Pat Talley	1021	Brenda Grover
955	Linda Merrill	1022	William S. Clifford
956	Ginny Gilbreath-Fienga	1023	Zak A. Jarnell
957	Aubrey R. McKinney	1024	William D. Wray
958	Kenneth P. Beard	1025	Janie Henry
959	Timothy K. Perttula	1026	Mr. R. Skarke
960	Dan Sell	1027	E.P. Thurman
961	John Head	1028	Helen Hutchins
962	Chris Elwood	1029	Paul B. Owens
963	Carla Ortiz	1030	Sonia M. Martinez
964	Pat Dunn	1031	Paul E. Thetford
965	Donnie A. Tow	1032	W.W. Perry
966	Steve Jessup	1033	Barbara J. Neal
967	Carolyn Joseph	1034	Claudia Chaffin
968	Diana R. Johnson	1035	Larry Barker
969	Kelly Spiller	1036	Madge E. van der Meer
970	Madge O'Brien	1037	Jenna Scott
971	George D. Walker	1038	George C. Onstott, Jr.
972	Jo Luster	1039	Mary C. Lirette
973	Vivian Hill	1040	James M. Lieb
974	Heidi McNeil	1041	Durward P. Hulce
975	Paul D. Klippel	1042	Mary Ann Riss
976	Audrey a. Micheletti	1043	Joe Devito
977	Blanca N. Salinas	1044	Kevin Yeats
978	Patricia G. Kaye	1045	K. Suzanne Ricketts
979	Dennis J. Stanek	1046	Walt Sunday
980	Takuya Sakuraba	1047	Stephen Cole
981	John Kovar	1048	Anthony Hering
982	Bessie G. Cornelius	1049	Isabella R. Mohr
983	Luke Brandon	1050	Edith M. Hoyt
984	Charles McCabe	1051	Loretta J. Gerus
985	Leslie Ann Billings	1052	LaNona Higginbotham
986	John M. Fuqua, Jr.	1053	Den Holley
987	Nancy C. Flatt	1054	Leon C. Weiss, Jr.
988	Robert N. Flatt	1055	Kathleen Riller
989	S. David McKenney	1056	Peggy Evans
990	Leon Adickes	1057	Lee McCasland
991	Bruce R. Miles	1058	Stephanie P. Smith

1059	Monica Spurlock	1126	Janet J. Peatross
1060	Lee Svedeman	1127	L. James Lester
1061	Don Piller	1128	Paul Tanner
1062	Sherlyn Terry	1129	Stacy S. Pentecost
1063	Molly Seay	1130	Joseph Gelley
1064	Charles R. Foreman	1131	Bettye Padue
1065	Matt Hamje	1132	Barbara H. Massey
1066	Shirley L. Holland	1133	Ray B. Gulick
1067	Michael C. Rawlins	1134	Lowell E. Wade
1068	Bjorn Ahle	1135	Tori Coward
1069	Joshua E. Lloyd	1136	Jim Bates
1070	Joyce Meyer	1137	Mary Margaret Floyd
1071	Karen Brown	1138	M. Terri Thompson
1072	R. Daniel Turnipesco	1139	Diane Brinkmeyer
1073	Dirk T. Burgess	1140	Shaun J. Richard
1074	Patricia L. Bailey	1141	Aletheia Morris
1075	Dorothy H. Johnson	1142	Eric Ruckstuhl
1076	Retha Jane Woods	1143	Marietta Innmon
1077	Patricia P. Weiss	1144	Lettalou G. Whittington
1078	Charles J. Shipman	1145	Dolores Hall
1079	Judy Cato	1146	Tracy S. King
1080	Michael B. Wortham	1147	James H. Sims
1081	Everett Evans	1148	J. Roseaberger
1082	Louis B. Parks	1149	Paul Jetie
1083	Richard P. Massey	1150	Georga Cash
1084	Helen Roy Turnipseed	1151	JoAnn Hazard
1085	Richard Schiebel	1152	Holly T. Boyle
1086	Albert M. Armand	1153	Larry Hansen
1087	John I. Franton	1154	Katherine W. Piper
1088	Gloria B. Franton	1155	Annie M. Armand
1089	Dale R. Peters	1156	Carley Ann Armand
1090	Judy Attaway	1157	William B. McAnally
1091	Mary Flick	1158	George R. Mays
1092	Lois W. Morgan	1159	Sally Schott
1093	Bruce Japper	1160	David Holzmer
1094	David M. Zumbaugh	1161	Ann Brede
1095	David Sirbaaku	1162	Chalon Mullins
1096	Jennifer Clay	1163	Sandra Peterson
1097	Sandra L. Cavanaugh	1164	Elaine McCallion
1098	Betty R. Thetford	1165	Raymond L. Golitko
1099	Jil Budziszewski	1166	Deborah Fisdich
1100	M. Stephen Lucas	1167	John R. Swanson
1101	Jane Maute	1168	Betty R. Casey
1102	Irene Houston	1169	Kristen Keller
1103	Sara Raiman	1170	Sherman Robinson
1104	Joy Hester	1171	Paula Nash Holliday
1105	Ramiro Rodrigiez	1172	Patti McGinnis
1106	Charlene Bartholomme	1173	D.J. Butler
1107	Mikie Perroni	1174	Gerald G. Maloney
1108	Mike Peters	1175	Nellie M. Archer
1109	Cordelia A. Perroni	1176	Karen A. Madderra
1110	Eleanor Roman	1177	Judith Jenkins
1111	Garnet L. Cunningham	1178	Herman Dobbs
1112	Kathryn Louie	1179	Irma Gutierrez
1113	Rita Leal	1180	Frances C. Peterson
1114	Sean Connor	1181	Judy Spurlock
1115	Caroline Alexander	1182	Jennifer Lowry
1116	Karen L. Thomas	1183	M.A. Breedlove
1117	Karen McIver	1184	Arthur B. Brite
1118	Rick Shivestrg	1185	Kenneth McCorlel
1119	Martha J. Ohlson	1186	Rodney J. Horn
1120	Matt Borneman	1187	Steven C. Abbott
1121	H.A. Thomas	1188	John Butwid
1122	Mike Behrmann	1189	William J. Burton
1123	Nina Griffin	1190	Nicole Maddux
1124	Karsten Melcher	1191	Jamie Heavey
1125	Deborah Kliethermes	1192	Dolores Woodruff

1193	Mark J. Jackson	1260	Carole H. Allen
1194	Barbara L. Betzko	1261	Jacqueline S. Geyer
1195	Christopher Close	1262	Tom L. Herrick
1196	Nick Kiddy	1263	David Rains
1197	Paul D. Schultz	1264	Carl H. Herzog
1198	Isolde E. Kellock	1265	John W. Caudill
1199	Lloyd W. Oliver	1266	Jim Krakowski
1200	Lynda L. Arnold	1267	Rachel Knox
1201	Christine D. Persio	1268	Marie Preston
1202	T.W. Bourick	1269	Wilson Braden
1203	Rose Hernandez	1270	Roberta J. Smith
1204	F.E. Champion	1271	Larry G. Haugen
1205	Kerry Townsend	1272	Peter Bowman
1206	Elaine M. Nitschke	1273	Iris Taffel Silvere
1207	Ray B. Wetherell	1274	Jennifer J. Cummings
1208	Marcia Jackson	1275	Suzanne Tuttle
1209	V.L. Caldwell	1276	Dawn Borsheim
1210	David Kramer	1277	Margarete Egan
1211	Carol Clark	1278	Catherine A. Rich
1212	Ross P. Kennedy	1279	Joel Winston
1213	Michael E. Mizell	1280	Wes Moore
1214	Melody Bernstein	1281	Mike Pirtle
1215	Amy Weinhouse	1282	Robert R. Barclay
1216	Osama Dawoudi	1283	Rose Marie Culmer
1217	Matt Bishop	1284	C.E. Hart
1218	George E. Cauthen	1285	Lynne B. Johnson
1219	John Michael Stovall	1286	Ted E. Ryan
1220	Joe Anne Berwick	1287	Else Knappenberger
1221	Dusty Cheryl Roberts	1288	Beatrice Shepreen
1222	Sally Robinson	1289	Christopher S. Binnings
1223	Karen Stocktan	1290	Celia Sanchez
1224	Linda Goller	1291	Anthony P. King
1225	Lornis M. Van Loon	1292	Jackie A. Pace
1226	Ted E. Ryan	1293	Lupe Garcia
1227	Danny Davis	1294	Peter Spong
1228	Barbara E. Lewis	1295	Lamar Wildinson
1229	Pamela S. Hughes	1296	Jean Stitzlein
1230	Robert F. Smith	1297	Dorris M. Bauer
1231	David S. Ross	1298	Jayne R. Smith
1232	Larry Denner	1299	Annette B. Jones
1233	Marjory Van Sickle	1300	Rita M. Flores
1234	M.J. Schultze	1301	Gardiner Roddey
1235	Tom Wilbanks	1302	Richard N. Evans
1236	Anne V. Tincher	1303	Carlita Zummo
1237	Carol M. Collins	1304	Gale Briggs
1238	Pierre Catala	1305	A.L. Vawter
1239	John W. Linker	1306	June Van Oart
1240	Rupert Hazle	1307	Gary Lou
1241	Michael J. Powers	1308	H.A. (Joe) Pase III
1242	Seth C. Howell	1309	James E. Bruseth
1243	Maria Griswold	1310	Tom Maddux
1244	James J. Lyons	1311	Efrain Sandalio
1245	Wallace S. Brians	1312	D.S. Mattiza
1246	Lucy Shields	1313	Mark Warhol
1247	Sam House	1314	Linda Shaw Hambric
1248	James E. Meyer	1315	C.D. Sykes
1249	Carl Lindsey	1316	Rupert Holland
1250	Don W. Day	1317	Susan E. Wingfield
1251	Alice C. Tillet	1318	Aimec Lea Palmer
1252	Karen L. Baker	1319	Waneta Doege
1253	Donald D. Dearmont	1320	Damon Pennington
1254	G. Edwards	1321	Julie DeBlanc
1255	Geoffery Wakefield	1322	Janet McGwamery
1256	Ronald F. Billings	1323	Binz DeWalch
1257	Ralph B. Latchaw, Jr.	1324	Elaine Evans
1258	Richard M. Donavan	1325	Willie Allen
1259	Bonnie E. Wenk	1326	Cathy Tavangarian

1327	M. Hay	1395	Didier T. Jaen
1328	Jane Isaacs	1396	Shirley F. Hurt
1329	Margaret E. Finn	1397	James M. Hollis
1330	Joanne Pierrescott	1398	Eric William Swanson
1331	David P. Brown III	1399	Lynn E. Miller
1332	Kristina Seller	1400	Wendy Beck Von Peccoz
1333	Mabel H. Graham	1401	Michael Honel
1334	Johathan Perry	1402	George & Linda Pogue Avdl
1335	Margrit Woods	1403	Gloria Robb
1336	Ronnie Wilson	1404	Carol Farmer
1337	Sally Fisher	1405	Deborah E. Buscher
1338	Bobby Bin	1406	Blair Heltkamp
1339	Christopher Alk	1407	M. Clifford Mayer
1340	Wendy Leigh Ezernack	1408	Kathy Cornehl
1341	Sharon McCollum	1409	Margaret Dutch
1342	M. Coburn	1410	Gary R. Edmondson
1343	Jeff Mitcham	1411	Marc E. Amberson
1344	Courtney McCollum	1412	Darline Stoll
1345	R.V. Garuclem	1413	Raphael Sher
1346	Robert C. RainsIII	1414	Raymond Swiatkowski
1347	Barbara Bernett	1415	Holly Kuper
1348	David Wilson Young	1416	Lori A. Durieux
1349	Sue Pope	1417	Ken Kramer
1351	Patricia Grimes	1418	Carol Haase-Greenley
1352	Patrick D. Cox	1419	Eric J. Van Buren
1353	Betty Slouacek	1420	Tim Kramer
1354	Suzanne K. Oliver	1421	James E. & Bausg Johnson
1355	Carolyn Croom	1422	Charles E. Fourest
1356	Noel Pettingell	1423	Rodney Choate
1357	Linda Tennyson	1424	John G. Getaeh
1358	Urban S. Allan	1425	Lori S. VandBunt
1359	Kay B. Cleveland	1426	Russell Fory
1360	Sarah Handler	1427	Catherine Fine
1361	Marvin W. Smith	1428	Esther M. Baker
1362	Carole Wilmoth	1429	Janie A. Harris
1363	Alice Drake	1430	John K. Alexandar
1364	Pat Wade	1431	Diane L. Statham
1365	Martha Lapierre	1432	Donald L. Benham
1366	Richard C. Conner	1433	Leo A. Reitan
1367	Stephen R. Wheaton	1434	Tom & Marilyn Brown
1368	Korina Marcano	1435	Joseph Murphy
1369	Jerry Curless	1436	William W. Willey III
1370	D.R. Brown	1437	Joe Adams
1371	Stephen Swartz	1438	W. Norman Davis
1372	Sonia Marcano	1439	Steven J. Milauskas
1373	Robert P. Wiley	1440	David A. Fosdick
1374	C. Zewiwi	1441	George H. Ramey
1375	Alex Ross	1442	Thomas L. Dixon
1376	James R. Anderson	1443	Daniel A. Davis
1377	Rose Yunker	1444	Stephen Evans
1378	W.A. Mitchell	1445	Henry Horne, Jr.
1379	Laura E. Wingficid	1446	Margie O. Koutroulis
1380	John Cook	1447	Jane W. Elioseff
1381	Glen Telge	1448	A. Lila Silva
1382	Scott Stallings	1449	Alana Evans
1383	Kyle W. King	1450	Tom Groover
1384	Karen Bell	1451	Robert M. Peck
1385	Fred H. Wills	1452	George & Jeannett Crawford
1386	Abigail Brown	1453	David A. Todd
1387	Hiram P. Arnold	1454	Arthur J. Herbert, Jr.
1388	Jessie Coward	1455	Georgia L. Haskell
1389	W.R. McDuff	1456	Ms. B. Zimmelman
1390	Sharon Rout	1457	Gordon B. Norris
1391	Rodney Dolan	1458	Robert Verret
1392	Charles Callery	1459	Marlene Tremblay Smith
1393	R. Stephen Hillis	1460	William Schriever
1394	John C. Hooper, Jr.	1461	Bernice Clark

1462	Richard M. Browning	1529	Alder Doyle
1463	David A. Todd	1530	Albert Wang
1464	Beth Street	1531	Juan Carlos Garcia
1465	James D. Chapman	1532	Jean Wang Lin
1466	Jim and Betsy Courtney	1533	Akif Uzman
1467	Al Lide	1534	James Shimek
1468	Jim Stoltz	1535	Ronnie Williams
1469	Barbara King	1536	Ralph Stivison
1470	Kimberly Zaller	1537	Sonny B. Lyles
1471	Barrie Scardino	1538	Stanley H. Fharance
1472	R. Scott Beasley	1539	Cristy & David Nordstorm
1473	Pat Miser	1540	Ollie Young
1474	L.T. Lambertz	1541	Elisa J. Long
1475	Dee Bash	1542	Zuley Pruiž Vann
1476	Gina Buelangham	1543	John A. Smegal
1477	Beverly Karnes	1544	Annabel Levy
1478	Paul McManus	1545	Aurelio Diez
1479	Donna Diener	1546	Alison W. Gemp
1480	Lisa Wathenl	1547	Dennis M. Woodward
1481	Charla O. McManus	1548	Mary B. Duncan
1482	Peggy Head	1549	Martha Pulido
1483	Nikki Olivo	1550	Ralph G. Blakesley
1484	Robert N. Romero	1551	David A. Whitesides
1485	Suzanne C. Henwood	1552	Robert L. Pendergast
1486	Ann Marguart	1553	Robert P. Madrulli
1487	Michael Miller	1554	Kevin Thomas
1488	V. Clay Cauthorn	1555	Steve Toon
1489	Ethlrie Barber	1556	Crista Hansen
1490	Carol M. Keister	1557	Amy B. Cooper
1491	Nacina R. Piclay	1558	Rebecca J. Vandebunt
1492	Anna Wilhamson	1559	R.M. Gray
1493	Weimin Chen	1560	Paul Lindberg
1494	Steve Marterstock	1561	James M. Braden
1495	Barbara Inahara	1562	Scott Yates
1496	Gary S. Pardue	1563	Phyllis Van Kerrebrook
1497	John W. Rebsrock	1564	Hank Kastner
1498	Stephanie Strickland	1565	William M. Gazas
1499	Keith Conarroe	1566	Edward Silha
1500	Susan D. Goodsen	1567	Gary Romeo
1501	Margaret A. Goetz	1568	Wayne Schoettle
1502	Shelley Corman	1569	Eva S. McLeod
1503	James A. Muir	1570	Dave Matztin
1504	Donna & William Ellis	1571	Gatlin L. Mitchell
1505	Emily McKay	1572	Sue Fisher
1506	M.W. Resnick	1573	Charles F. Smith
1507	George R. Mays	1574	Jack E. Bates
1508	James E. Ohman	1575	Elizabeth Anne Booth
1509	Mary R. Newman	1576	Nick Nickelson
1510	Larry G. Miller	1577	Nancy Brooks
1511	Larry Reed	1578	Gary Dearing
1512	Dan & Linda Sell	1579	Helen Potter Harper
1513	Ann Salyer-Caldwell	1580	John Brooks
1514	Sandra C. Stewart	1581	Gary Willey
1515	Teresa T. Hajny	1582	Ellen Robbins Red
1516	Ron McManus	1583	Al Cravens
1517	Suzanne Severide	1584	Shaun Martin
1518	Mary Baily	1585	Jack Jennings
1519	Susan Belcher	1586	James A. Williams
1520	Mara K. Dowling	1587	Donna M. Stowe
1521	Conie Keller	1588	Rosemary Nicholas
1522	Jo An Bradley	1589	Randall M. Bell
1523	Frances Barnes	1590	Lilburn A. Goodson
1524	Richard Williams	1591	Wendy Franke
1525	Martin D. Beirne	1592	Mark Franke
1526	Craig B. Young	1593	John H. Sieber
1527	Clay Jackson	1594	Dorothy C. Wilson
1528	Randy Cook	1595	Jack Gartner

EIS-APPENDIX K - COMMENTERS BY LETTER NUMBER

1596	Jessica McNamara	1663	Lee H. Etheridge
1597	Deborah L. Sullivan	1664	Sheila Jackson
1598	Robert M. Plott	1665	Gerard C. Edwards
1599	Marilyn Kinney	1666	Linda B. Wickwire
1600	John Metivier	1667	Mark Mulrooney
1601	Robert E. Partridge	1668	John Erickson
1602	Bill Ferguson	1669	Jean Hamil
1603	Deborah B. Baker	1670	Susan Schinke
1604	Edward C. Fritz	1671	Andrew Sansom
1605	George Russell	1672	Mark A. Carter
1606	Julie Jeter-Edwards	1673	Joseph B. Martin, II
1607	Becky Stanbery	1674	Lee J. Schmitt
1608	Bruce W. Sieve	1675	Curt Havard
1609	Denise Rhames	1676	Lynn Hartt
1610	John W. Spence	1677	Floyd A. Watson
1611	Bruce McNellie	1678	Carl T. Bledsoe, Jr.
1612	Ron Hufford	1679	Cliff Rushing
1613	Ray Hooper	1680	Mark Stout
1614	Bob Currie	1681	Phillip Chaney
1615	Aaron Higginbotham	1682	Julie Bell
1616	Richard C. Wright Jr.	1683	Jon Trahan
1617	Bonnie Wright	1684	Beth Gunn
1618	Gene Borders	1685	Jess G. Morales
1619	Earl G. Ussery	1686	Kathi Cronan
1620	W.D. Bouillion	1687	Sherma Van Riper
1621	George Gumberger	1688	Randal M. Hall
1622	Heinz A. Gaylord	1689	Kelly Tamlecaley
1623	Clark Walker	1690	Brian P. Boles
1624	David Ford	1691	Kendall Tomasso
1625	Beth Bowling	1692	Mike Bixler
1626	Ellen Mayou	1693	N.E. Henderson
1627	Frank B. Shockley	1694	Z.C. Hutchinson
1628	Richard A. Walker	1695	A.B. Rauer
1629	Harris Martin	1696	Pirjo Klint
1630	Joe Wells	1697	Frank Soltzman
1631	Earl H. Brunham	1698	J.R. Barnett
1632	Larry D. Shelton	1699	Stephen A. Foote
1633	Todd Nichols	1700	Beverly W. Jordan
1634	Daymon Rambin	1701	Elaine Vondrasek
1635	Robert Verret	1702	Sedge Simons
1636	Norman Young	1703	Wanda L. Smith
1637	Carla & Scott Carleton	1704	Carla Farley
1638	Scott Carleton	1705	Naomi Driscell
1639	Lois M. Rose	1706	James Tiebout
1640	Myra La Pierre	1707	Guy Hagstette
1641	Mike Vackar	1708	David F. Doolittle
1642	Bob Windham	1709	Gonlalo Arellano
1643	Gary Windham	1710	Frances Perry
1644	Bennie E. King	1711	Joe Bozques
1645	Ed Keely	1712	David Chou
1646	Rebecca and Rusty Cluck	1713	Timothy M. Elford
1647	Dennis A. Smith	1714	Lance Duncan
1648	Sedge L. Simons	1715	J. Susan Smith
1649	Michael Harris	1716	W. David Tracey
1650	Matt Howell	1717	Becky Davis
1651	Leon E. Ray	1718	Kerry Barnes
1652	R. Michael Devenport	1719	Bill J. Davis
1653	Don Dickerson	1720	Kayee Halstead
1654	Kenneth N. Huete	1721	Jesse Wright
1655	Ike McWhorter	1722	Dora M. Buzbee
1656	Johnny A. Tobias	1723	Brandt Mannchen
1657	Jeff Allen	1724	Jan Dixon
1658	Lorraine G. Bonney	1725	Ann Hope Orlando
1659	Frank Blake	1726	R.J. Parry
1660	Jenny Jeffereys	1727	Pamela O. McCann
1661	Carla Hassell	1728	James R. Jackson
1662	Joe D. Pumphery II	1729	Charles L. Miller

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

## ALPHABETICAL LIST OF COMMENTERS

---

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	Anzalone, Mario
1175	Archer, Nellie M.
1709	Arellano, Gonzalo
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, Ethrie  
 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 Bartholomue, 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

472       Bennett, Barbara  
 1347       Bennett, 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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Conway, 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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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
390	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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

986	Fuqua, Jr., John M.
652	Gallett, Ray
574	Gallanto, R. P.
25	Galloway, 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
497	Gibson, Shirley A.
110	Giesbrecht, Martin
785	Gilbert, Margaret A.
956	Gilbreath-Pienga, Ginny
1783	Gillespie, Hope Neely
399	Gillespie, Tim
93	Gillette, M. E.
467	Gladman, J. Craig
280	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.

## EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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, Janie  
 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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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, Irene
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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Jetic, 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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, Eleanor 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Pa ce, 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 Peace, 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Ramin, 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

760 Reiser, Katharyn D.  
 1433 Reitan, Leo A.  
 885 Renibert, 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 Rodriguez, 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 Ruggiero, James  
 563 Rundel, Amy  
 1679 Rushing, Cliff  
 1764 Rushing, Cliff  
 476 Russell, B. L.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Silva, 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, Gregory 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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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 Stepchiaki, 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 Tamlecaley, Kelly  
 1128 Tanner, Paul  
 1326 Tavangarian, Cathy  
 1829 Taylor, Charles  
 263 Taylor, David E.  
 572 Teats, Betty B.  
 1381 Telge, Glen

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

1357	Tennyson, Linda
694	Terrell, Clark
1733	Terry, David K.
1092	Terry, Sherlyn
873	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	Turetzky, Greg
553	Turnbull, Lon
1072	Turnipesco, R. Daniel
1084	Turnipseed, Helen Roy
1275	Tuttle, Suzanne
585	Tveten, John L.
1797	Ullrich, Christine
288	Unterharnscheidt, 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

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

1419 Van Buren, Eric J.  
 1563 Van Kerrebroek, 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 Pruijz  
 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 Watheni, 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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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.

EIS-APPENDIX K - ALPHABETICAL LIST OF COMMENTERS

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
18	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

Issue: 1-1 Natural values - Plant, Animal & Community 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:** 1285 ...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 EGS 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**Issue:** 1-1

Natural values - Plant, Animal & Community 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 (BIS 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 or 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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-6b-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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPs. Many special areas

**Response:** The Forest is currently developing its old growth policy. The NFGT plans to provide areas of managed and unmanaged old growth.

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. 5/7 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 management.    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 artificially 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 1-2

Old Growth

Letter: 1723 (MA-6b-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 DRIS) 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 DRIS)...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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 ephemeral 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 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:** 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 streamside 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 IPW 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 addition 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 exacerbates 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 ephemeral 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 feet 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 EMPS 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

- 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 controlled 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 pileatus) in the "Bottomlands Streamside" 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 or 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.

Appendix-k page: 14

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, Herby, 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**Issue:** 1-7                      Ecosystem Mgmt

**Letter:** 1632    Soil series which need to be reevaluated for vegetational typing include: Sacul, Lacerda, Woodbell, 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NFET. 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 mature 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 NPSF 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 severely eroded gullies require mechanical treatments.

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

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 ..ITA 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 ITA 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/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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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. (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 GWZ's at the discretion of the timber sales administrator is not justifiable.

**Letter:** 1605 Allowing skidders inside GWZ'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 NP 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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. Each 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 NFMT 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 RIS 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 2-1 Harvest Methods/silvicultural Systems

**Letter: 277** ...the plan continues to emphasize 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 ... ait. IV B.

**Letter: 1453** I urge... an end to all even-aged management on NPS, 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 NFEF. 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 FLPWA 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% BAM & the Forplan model chose to take the majority of BAM 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 NFEF 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?  
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**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 experiments 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, salamander 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).

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

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PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

- 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 many 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 IDI 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:** NPS 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 NFMMA, 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 NPT 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 than 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.  
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PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 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. 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 mycorrhiza 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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: (WA-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 ...

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 undesirable 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 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 relic 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ITA as a dominantly longleaf type. I feel that the other ITAs 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. Appendix-k page: 36

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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)(B) 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 INP 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 NPT. 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

- 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 it is even-aged or uneven-aged. Areas where single-tree selection 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 NPT 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 #1-25, 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 LUP.

**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 NPT 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-specific analysis using ECS. NPT 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 to 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 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. 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: (WA-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 artificial 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 possibly 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 ECS 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 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.

**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. 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 Pinewoods 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 NP 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 seasonality 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-resistant 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 NFWA... 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 than 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 NFWA.
- 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 ignition. 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 lightning 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 condition. 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 than 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 mimicked the frequency, regime, intensity, and seasonality of natural fires and this plan does not appear to radically change the way you do burning. This is not EM 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-1-1-31) ...the 3-7 years fire interval is too frequent and does not match the historical level of fire.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NP. 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.

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**Letter:** 1723 (pg 31 DBIS)...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 lightning 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 condition. 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 than 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.

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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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 2-3 Prescribed Fire

**Response:** Ecosystem mgmt. does not mean that all mgmt. activities must 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 FRIS 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 herbicides 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 documentation 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NFGF.  
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 NFGF 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 (WA-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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 NPT. 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 selection 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPT 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 programmatic 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 commercial 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 SFB 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 incorporated as a guide?

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

Issue: 3

SPECIAL MANAGEMENT AREAS

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 intensive, 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 3-1-1 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, 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 activities 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.  
Appendix-k page: 52

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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-81e82 - ... 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, DBIS)...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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, DBIS) ... 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 Wildexness 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 uncontrollable. -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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 3-2 Wilderness Allocations

- Letter:** 1167 To include the following areas and acres as located on the NF&S 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 NP. 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 NFER 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 NP 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, untrammelled 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 various vegetational types. Natural lightning fires should be allowed to interact with the wilderness landscape to the greatest degree possible.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NFOT wilderness areas existed prior to wilderness designation.

**Letter:** 1605 Everything possible must be done to preserve the integrity of these wilderness areas.

**Response:** NFOT 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 3-3 Wilderness Management

**Letter:** 1723 Horses should not be allowed in wilderness areas.

**Response:** Horses are an accepted primitive, non-mechanical means of transportation in wilderness. Present use of horses in NFCT 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 NFCT 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 FRIS Appendix E for W&S overview process & recommendations.

Appendix-k

page: 62

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 DEIS 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 Neblette 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ... ATVs 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NFGF 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 ORV's. ...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 citizens 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 ATVs 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ATVs in the NFs of Texas, especially 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.  
Appendix-k page: 67

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ORV'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 they 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 conducive 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 children (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, 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 already decimated by pipelines, powerlines & roads - please place no more for ORV & equestrian trails than roads & paths are available to them already.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 4-3 ORV trails in the Forest

**Response:** An ever increasing population, demanding 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 streambanks 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 NF&T 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 FIRM 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

- 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 corraling 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 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, especially 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 opportunity 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 PWR'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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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 seem 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 LRMP 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 ORV 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 NFPs 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 within 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 than 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-consuming.

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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. 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 consider 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

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 pollution.

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 DUEMP'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...

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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"! (WA-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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NFGE has been well documented in the NFGE 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 and sufficient regeneration through staged overwood reduction; the lack of system. This system offers the flexibility to provide both habitat and sufficient regeneration of RCW will require all silvicultural tools in the future, which includes both uneven-aged (USAM) 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 NFGE. 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 NFGE 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 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 relic 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 perimeter 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:** Additional discussion of SPB control actions & affects to Old Growth, Fragmentation, & 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 OFV 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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 NPs. 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 SHNP 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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&WS. 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 DBIS)...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 BAM 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:** NREGT population objectives for RCW are stated in the FRIS 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 effect 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 AVY's are doing any harm.
- Letter:** 1802 The mgt prescription for the RCW states that a broad spectrum of recreation opportunities (including ORV) can be accommodated within RCW habitat. It does single out the ORV user, stating that ORV 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 ORV 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 ...PS 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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).

**Letter:** 1605 The DEIS... fails to provide adequate research and data for its conclusory assertion that: "In all alts, 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 SPB nor 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).

**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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 HWAs 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.

FLAN AND EIS COMMENTS  
Comments by Issue and Response

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 "repellent" 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 "repellent" 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 infestations. Characteristics contributing to pine stress and subsequent SPB infestation include: 1) high water table/soil 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 particularly 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, DRIS)...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, DRIS)...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...

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 adjoins 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**Issue: 6-2**      SPB Control Measures

**Letter:** 1636 I favor no use of pesticides 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 pheromone pocket treatment seems a worthwhile 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 SPEIS 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 (USHT) 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. Pheromones may be used.

**Letter:** 1605 SPE control in sensitive areas should be limited to the use of the pheromone verbenone.

**PLAN AND DEIS COMMENTS**  
**Comments by Issue and Response**

**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 significant 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 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 HMAAs 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 infested 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 infested 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 DEIS 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).

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 pheromones 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 extent 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 silvicultural techniques to reduce SPB hazard.

**Letter:** 1310   **Recommendation:** No trees are cut within SMZ's for SPB control. Pheromones 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 DEIS 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 88% 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 management. SPB cutting must be scrutinized for the essentially 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. Appendix-k page: 98

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 silvicultural 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 Management 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPT 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 reseed and revert to timber production. You are wasting a lot of potential timber area with unnecessary, extravagant roads.

**Letter:** 1723 (WA-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&Gs. 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 construction vs. old is not clearly defined. Without these figures, 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 SFGS. 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 management. 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 NREG? 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 fragmentation 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 SEG. 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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 regulations (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 involved.

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 SEG. 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 RS-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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 NPs.
- 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 NPs.
- 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 equestrian 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 indiscriminate shooting are identified.

**Issue:** 7-5-2 Hiking trails

- Letter:** 132 Keep horses off the Lone Star trail.
- Letter:** 538 Please consider restructuring 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.

PLAN AND HIS COMMENTS  
Comments by Issue and Response

Issue: 7-5-2 Hiking trails

**Letter:** 144 Many sections of our trail have been devastated 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPs.
- 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 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 7-8 Trails 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 (WA-9a-31)...add "if ecosystems are protected and not overused" to the sentence.

**Response:** Comment noted.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 225 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 3-1 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 mmhf/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 top-ranked 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.  
Appendix-k page: 113

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 manage 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 ...

PLAN AND HIS COMMENTS  
Comments by Issue and Response

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 absolutely 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 NPs 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPs 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 ecosystem 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 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.

**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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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 (WA-5-44)...limits to motors must, not may, be applied.

**Letter:** 1723 (WA-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 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, ... 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 DBIS) 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 NPS.

**Response:** Comment noted.

**Letter: 1723** (pg 82 DBIS) you need to show what your plan is for reintroduction of both the Louisiana Black Bear and Red Wolf are for the Texas NPS.

**Response:** We support the recovery plans for these 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 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).

**Response:** The high production alt. was not chosen.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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).

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, posseums, 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 activities "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 SEG. 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 ...

PLAN AND EIS COMMENTS  
Comments by Issue and Response

**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 SWZ, 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.

PLAN AND HIS COMMENTS  
Comments by Issue and Response

Issue: 10 RECREATION

Issue: 10-1 General Recreation

- Letter:** 1258 NPS 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 (WA-9a-89) It is duplicative. [WA-9a-51] Remove it.
- Letter:** 1723 (WA-9b-116) ...firearms must not be allowed.
- Letter:** 1723 (WA-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 WA-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 (WA-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 (WA-8b-81)...I am for only semi-primitive and primitive activities in river corridors.
- Letter:** 1723 (WA-8c-96)...no discharge of firearms. There also should be no bow and arrows, too.
- Letter:** 1723 (WA-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 NPT, 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 NPS. ...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 management 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 measurable.

**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.  
Appendix-k page: 125

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**Issue:** 10-1      General Recreation

**Letter:** 1723 (plan pg 112) - 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 TNP'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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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, DBIS)...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 USEFWS 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 USEFWS and the State of Texas.
- Letter:** 1605 With a backlog of \$16 million in needed repairs to existing facilities ..., it is inappropriate 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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, availability 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, DRIS)...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 sometimes 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 10-4                      Hunting

**Letter:** 1723 (WA-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 NPT. 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, visible 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

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 nurture 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 RIRMP 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, 216, and 223. The type of inventory should be specified, i.e. "100%" Inventory, or "100%" Archeological Survey"

**Response:** "Complete a Cultural Resource Inventory" is synonymous with "Completing Consultation with SHPO", per 36 CFR 800.4-800.6, and the RAPA, Forest level MOU, and HRM.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NREGT.

**Response:** These documents are incorporated by reference and do not need to be appended. We would be 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 Preservation 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 abdicationing this responsibility and I object.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 counterproductive & 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 noncommittal... 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 understorey plants...
- Response:** You are totally correct when you say types of activities and type of forest allowed. Without some type of understorey management to control, understorey 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....

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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) ...interpretive 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 kiln 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-use 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NP 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 alte. would be similar.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ait 6 wildlife will have a cleaner water supply because erosion would be less (than ait 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 NFTP 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 ...

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 negligible 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 gulying. 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:** 1690 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.

**PLAN AND EIS COMMENTS**  
**Comments by Issue and Response**

**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 Broadus, 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 SWZ'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 NF. 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 NF.

**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 NF 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 NF 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 (SWZ) 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 (WA-9a-134)...33% soil compaction is too much to allow. You need to drop this to 15-20%

**Response:** This is referring to developed recreation sites that have been removed from the suitable land base.

**Letter:** 1723 WA-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 NPTX 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 impactful, 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 NPT. 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 than 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 DRIS)...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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 ..." (FPLMA 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPT are ultimately governed by the people of the US. At this time, how timber companies operate does not affect how the NPT'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 HWAs, 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 MMSF 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 undesirable mid-story vegetation, by installing artificial cavities in trees, etc. NFGT timber sales are advertised & sold by sealed bids to the highest 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 (WA-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.

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PLAN AND EIS COMMENTS  
Comments by Issue and Response

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. IBJ 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 IBJ 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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, 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 alteration of the plant community.

**Letter:** 1723 (pg. 106, DEIS)...the chance for catastrophic wildfire is very low.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

Issue: 11-5 Wildfire

Response: Comment noted.

**Letter:** 1723 (pg. 105, DBIS) ...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)(B) 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 NPS 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:** 1494 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.

PLAN AND EIS COMMENTS  
Comments by Issue and Response

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 many 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:** 1908 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 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 NPs 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 fundamentally 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 NPs. I am opposed to hunting in the NPs.