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Dear Rob and Theresa,

The Houston Regional Group and Lone Star Chapter of the Sierra Club (Sierra Club) provide these initial comments to the U.S. Forest Service (FS) for the Assessment Phase of the National Forests and Grasslands in Texas (NFGT) Forest Plan revision about Wilderness.

Previous Evaluation of Roadless Areas, Appendix D, Final Environmental Impact Statement, NFGT 1996 Land Resource Management Plan

The Sierra Club, in the early to mid-1990's, when the Draft and FEIS's for the 1996 Land and Resource Management Plan (LRMP) were prepared, criticized the FS for a Wilderness study that was biased and inaccurate. The Sierra Club believed then as it does now, areas like, Big Creek Scenic Area, Winters Bayou Scenic Area, and others, met the criteria of the Wilderness Act and should have been potential Wilderness Areas. It was evident to the Sierra Club that the scoring criteria were biased which artificially lowered scores. After scoring areas low, the FS stated that none of these possible Wilderness Areas scored sufficiently high on Wilderness criteria to be potential Wilderness Areas.

The Sierra Club is concerned that the current Wilderness Study process will not reflect all Wilderness Areas that meet Wilderness Act criteria for the NFGT Forest Plan revision.

#### Comments on the Initial Draft Wilderness Inventory for the NFGT Forest Plan Revision

The current Initial Draft Wilderness Inventory consists of a series of geographic information system (GIS) maps for each NFGT. These maps are on such a small scale that it is not possible for the Sierra Club to precisely determine where possible Wilderness Areas are in the areas that the FS has delineated. The Sierra Club recommends that maps be made available to the public that are large in scale (like the maps of each entire national forest that are sold to the public). These maps should include Compartments and stands where each potential Wilderness Area is, have easily seen existing roads (as well as their type and condition), include rivers and streams, oil/gas wells, other infrastructure, and have obvious boundaries for each potential Wilderness Area.

The Sierra Club believes that many of the acres that have been proposed as potential Wilderness Areas are crucial habitat for the federally endangered Red-cockaded Woodpecker (RCW). Management for the RCW includes thin logging, midstory removal logging, periodic prescribed burns, mulching, cavity inserts, cavity protection, and other intrusive and invasive mechanized management which disqualifies these areas from Wilderness Area consideration because the landscapes have been massively trammled. It is not a wise or an economical use of hard-to-get FS dollars to analyze areas that will not meet Wilderness criteria now or in the future due to management requirements for the RCW.

The FS should look at areas that do not need to be "managed" in any normal sense of the word. The type of management that Wilderness Areas or Wilderness Study Areas need is minimal and may include marked boundaries; education of users about the history of Wilderness, what is Wilderness, what is and is not allowed in Wilderness, what is in each Wilderness, how to use and protect Wilderness, etc.; and patrol and enforcement so illegal uses do not occur in Wilderness.

There are some areas that lend themselves more easily to potential Wilderness Area designation. In Sam Houston National Forest, the two scenic areas, Big Creek, and Winters Bayou, with minimal work (closing and obliterating a few roads), could be designated potential Wilderness Areas. To make a Wilderness study effective and more efficient the FS should focus on areas that are more Wilderness-like, could become Wilderness (recover from human impacts) quicker, and do not have endangered species management conflicts.

Other similar areas that could be potential Wilderness Areas include Beech Ravines Scenic Area and Upper Colorow Creek Scenic Area (Management Area 8c); Protected River and Stream Corridors along Winters Bayou in Sam Houston National Forest and the Neches River in Davy Crockett and Angelina National Forests (Management Area 8b); Bear Creek, Ayish Bayou, Yellowjacket Branch Creek, Attoyac River, and Upper Angelina River Special Bottomland Areas (Management Area 8e). Other places to consider analyzing for potential Wilderness Areas are lakes and their floodpools and streams or rivers and their floodplains and associated slopes and upland fringe.

The Sierra Club requests from the FS better and larger format maps with the information on them that is mentioned above. Then the Sierra Club and the public can visit these areas to view and more accurately analyze their Wilderness Area potential.

The Sierra Club appreciates this opportunity to provide our initial comments on Wilderness and the Assessment Phase of the NFGT Forest Plan revision process. Thank you.

Sincerely,

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