

From: Scott Merritt [scottm@mowild.org]
Sent: Monday, August 28, 2006 8:57 PM
To: 'comments-eastern-mark-twain-potosi@fs.fed.us'
Subject: Project #50617 St. Francois Knobs HFI Project Potosi/Fredericktown Ranger District

Dear Tom McGuire,

Missouri Wilderness Coalition (MWC) thanks you for the opportunity to comment on the St. Francois Knobs HFI Project. Please note that these comments are in regards to the part of the project described as the "Patterson Mountain area" and do not apply to the "Crane Tower area". Patterson and Kelley Mountains are within the Lower Rock Creek Sensitive Area, which is one of the most important primitive, wild landscapes in the St. Francois Mountains, and indeed all of the Ozark area. It is a treasure to the Forest, the citizens of Missouri, and the Nation.

While the Missouri Wilderness Coalition does not necessarily disagree with the practice of prescribed burning in Missouri wildlands, it is of the utmost importance that such activities do not negatively affect the wilderness characteristics of these areas. The construction of 13 miles of fireline will have a negative impact on the wilderness resource of Lower Rock Creek, so we stress that extraordinary care must be taken with any part of the project that deals with this area. The miles of fireline need to be minimized, and the methods employed in their construction and maintenance need to respect wilderness values.

a.. The use of bulldozers for creating fireline is totally inappropriate in Lower Rock Creek and all Missouri wildlands, and their use should be removed entirely from this project.

b.. Both the project and the wilderness character would be best served by limiting the fireline to the project boundary only, and removing any construction or reconstruction within the boundary that would subdivide the area.

c.. The existing Kelley Mountain fireline should not require reconstruction. Any light maintenance that may be needed would certainly not require the use of a bulldozer.

d.. In all cases, an emphasis should be placed on blending the burn units along borders of non-burn sites. As vegetation returns, the fireline should blend into the landscape and not become a dominate feature.

e.. MWC would like an assurance that firelines won't be included as "roads" (even of a primitive nature) if and when any roadless areas, including Lower Rock Creek, may be inventoried.

f.. The Forest Service should consider preparing an Environmental Assessment for the project, due to Lower Rock Creek's decades-old history as a Mark Twain National Forest Sensitive Area; the outpouring of public comment calling for its preservation during the 2005 Planning process; and the National significance of its rare, wild landscape.

Missouri Wilderness Coalition enjoys working with Mark Twain National Forest in pursuit of the highly critical preservation of all seven of the Forest's Sensitive Areas. We look forward to a project that will achieve its stated safety and ecological goals while putting the greatest emphasis on protecting the roadless and wild character of Lower Rock Creek. If such emphasis and

protections are not properly addressed, then we strongly feel that the “Patterson Mountain area” portion of the project should be dropped.

Sincerely,