

May 13, 2008

Elrand D. Denson
Houston/Rolla/Cedar Creek Ranger District
108 South Sam Houston Blvd.
Houston, MO 65483

Dear Mr. Denson:

We write regarding the Mark Twain National Forest Scoping Report for the Southwest Project (Project Number 2188) for the Houston/Rolla/Cedar Creek Ranger District, Boone and Callaway Counties. This central Missouri region is relatively heavily populated and developed, including the urban areas of Columbia, Fulton, and Jefferson City. Public forest lands here are critical and much more appreciated for their scenic, outdoor, and primitive recreational values than for any commodity values.

The new management outlined in the Southwest Project proposes resource development and manipulation significantly more aggressive than has been practiced for a number of decades. We question this shift, especially where amenity values so clearly outweigh commodity values.

Our specific comments are focused on prescriptions for the lands referred to as the "Epple Tract" contained in the Scoping Report's 'North Zone'. Since the USFS Roadless Area Review and Evaluation II in 1977-78, major conservation organizations in Missouri have identified and included part of this area within the Smith Creek Roadless Area. Then, in 1987, the 'Smith Creek Sensitive Area' became part of the Settlement Agreement resolving various appeals of the 1985 Mark Twain Forest Plan. Following Forest Service acquisition of the Epple Tract, the adjacent acreage connecting the Smith Creek area to Cedar Creek in Sections 22 and 27 was identified as part of the Smith Creek area in various appeals of the 2005 Forest Plan. Most recently, in 2007, this fuller area was incorporated in a formal proposal prepared by the Missouri Wilderness Coalition for designation under the provisions of the federal Wilderness Act (see map attached) and now endorsed by twenty-seven of Missouri's recreation, business, and conservation organizations, including some of the largest in the state (see list attached). This proposal was also conveyed to the Forest Service offices in Milwaukee and Rolla.

It is thus quite remarkable that this Southwest Project fails to accommodate or even reference this history and the widely recognized wildland values at stake in the proposed prescriptions which would affect lands of the Smith Creek Wilderness proposal:

- (1.) Timber cutting as identified on Map 2 of the North Zone would destroy the existing and recovering natural character of the area. It is also economically unjustified and wasteful of taxpayers' dollars due to the negative cost/benefit ratio.
- (2.) Proposed establishment of new grazing allotments in Sections 22 and 27 (North Zone, Map 4) with the attendant construction and maintenance of animal control structures and vehicle access facilities is likewise clearly incompatible with this area's highest and best uses for recreation and

natural succession. It is also unjustified by any local, regional, or national economic considerations.

- (3.) The most egregious and inappropriate proposal is shown on Map 1 of the North Zone, with the prescription for two new roads, two new parking areas, and a newly-constructed boat access on Cedar Creek itself. All of this threatens one form of recreation which is rare in Missouri (undeveloped wildland) in order to provide another which is abundant (vehicle-based development). This reverses the established priority values for this area, precluding further consideration of the area for wilderness, or any alternative designation for roadless use and enjoyment. The high cost for this development is an affront to taxpayers under the present economy. We are advised that the availability of federal "recreation funding" may be the motive to build this access. If so, we urge the agency to direct such funds to acquisition of streamside acreage and/or development at one of numerous alternative sites outside of, and therefore not impacting, the Smith Creek proposed wilderness.

Smith Creek proposed wilderness is a relatively small area and incorporates an authentic resource of wilderness in central Missouri. This should be cause for pride and celebration. The Forest Service could proceed with its development plans on the vast majority of the Cedar Creek District, and still protect the rare and valuable priority wildland resources of Smith Creek. That protection is the wisest and most prudent approach, in both an environmental and an economic sense.

Thank you for the opportunity to quickly review this scoping document. Please continue to send us any future planning proposals, we wish to be closely involved.

Sincerely,

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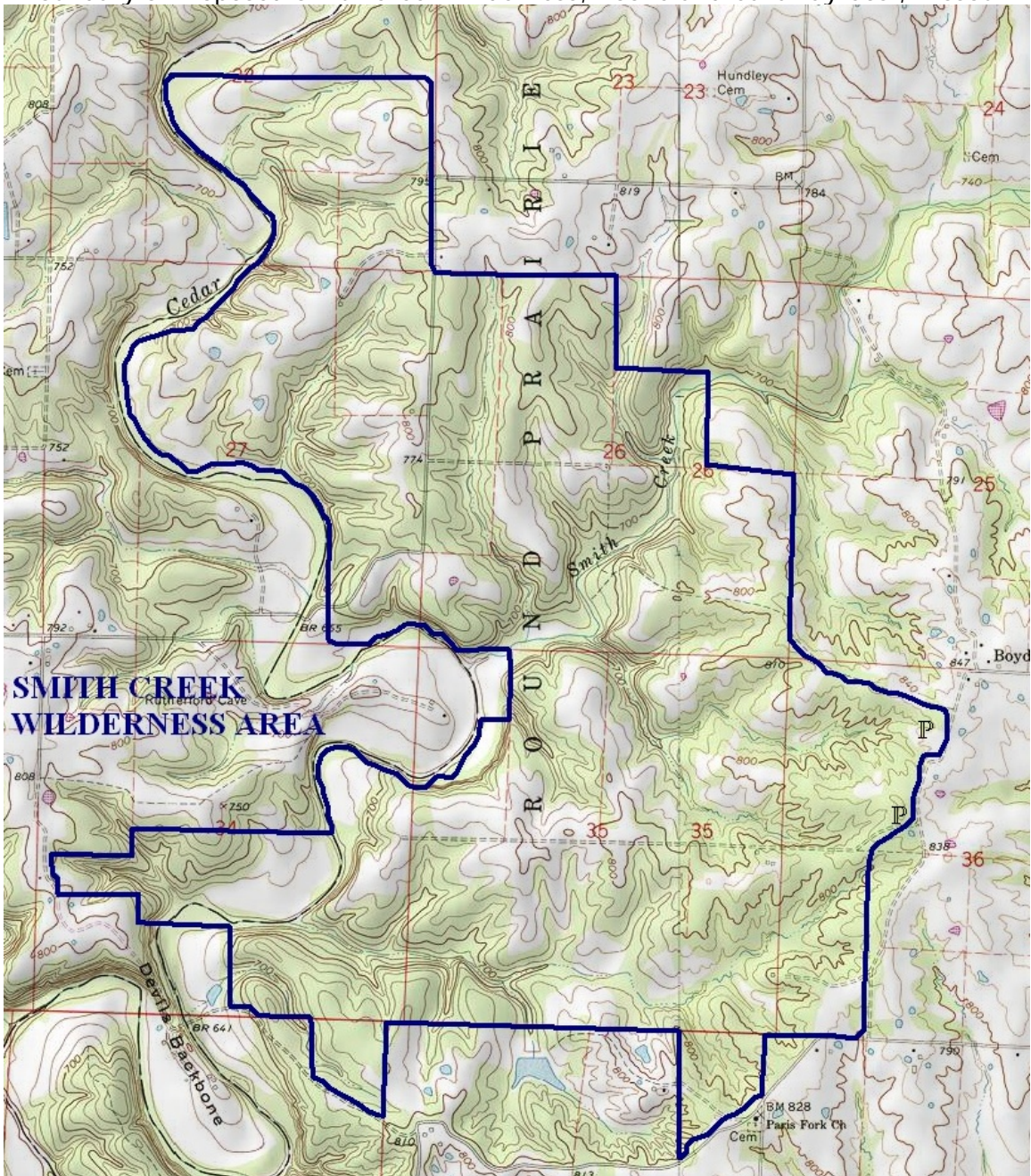
Greg Iffrig

Enclosures:

Boundary, Proposed Smith Creek Wilderness, Boone, Callaway Cos., Missouri
Endorsements, Proposal for Wilderness Areas in Missouri, May, 2008

Cc: Senator Christopher 'Kit' Bond
Senator Claire McCaskill
Representative Kenny Hulshoff
Missouri Wilderness Coalition affiliates

Boundary of Proposed Smith Creek Wilderness, Boone and Callaway Cos., Missouri



-ENDORSEMENTS-
PROPOSAL FOR WILDERNESS AREAS IN MISSOURI
MAY, 2008

Alpine Shop, St. Louis

Audubon Missouri

Cedar Creek Landowners, Ashland

Columbia Audubon Society

Conservation Federation of Missouri

East Ozarks Audubon, Farmington

Greater Ozarks Audubon, Springfield

Greenway Network

Heartwood, St. Louis

L-A-D Foundation

Missouri Chapter, Sierra Club (including four regional groups around Missouri)

Missouri Coalition for the Environment

Missouri Forest Alliance

Missouri Parks Association

Missouri Park and Recreation Association

Missouri Whitewater Association

Missouri Wilderness Coalition

Ozark Greenways, Springfield

Ozark Mountain Paddlers

Ozark Society (Missouri, Arkansas, Oklahoma, and Louisiana)

Ozark Wilderness Waterways Club

Photozarks

Republicans for Environmental Protection

Springfield Plateau Master Naturalists

St. Louis Audubon Society

St. Louis Open Space Council

Webster Groves Nature Study Society