

## Cement Project Area Environmental Assessment

### Appendix B Scoping Comments

Public comments received in response to project scoping are presented verbatim below. Also presented is an indication of how each comment was addressed by the Forest Service, including references to further information in the Environmental Assessment.

| Commentator  | Comment   | How or Where Comment is Addressed  |
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| <b>Biodiversity Associates*/Black Hills Group Sierra Club</b><br>(signed by Jeremy Nichols and for Brian Brademeyer) | Timber harvesting, road building...have severely diminished biodiversity on the BHNF through habitat destruction...it is imperative that the Forest Service make protecting and restoring biodiversity on the BHNF a priority...the Forest Service must not proceed with the proposed Cement project. | The no action alternative and analysis of effects (EA chapter 3) address this comment.   |
|  | We...request that if the agency chooses to proceed with the proposed timber sale despite our concerns, rather than allowing the forest to restore itself, the agency complete an environmental impact statement...An EIS is necessary due to the cumulative effects of past actions...                | Because no significant direct, indirect, or cumulative effects are expected to occur (EA chapter 3), preparation of an EIS is not required.  |
|  | An EIS is necessary to fully analyze and assess the...effects to the following...Northern goshawks and their habitat...   | Effects on northern goshawks and their habitat are addressed on pp. 61-63 of the EA.   |
|  | An EIS is necessary to fully analyze and assess the...effects to the following...Snail species of concern...  | Effects on snail species of concern are addressed on pp. 77-78 of the EA.  |
|  | An EIS is necessary to fully analyze and assess the...effects to the following...Sensitive woodpecker species...  | Effects on sensitive woodpecker species are addressed on pp. 64-67 of the EA.  |
| *Now Biodiversity Conservation Alliance  | An EIS is necessary to fully analyze and assess the...effects to the following...Other sensitive species, threatened, endangered, and proposed species, and all candidate species...  | Effects on threatened, endangered, proposed, and candidate species that may occur in the project area are addressed on pp. 60 and 87 of the EA. Effects on all sensitive species which may or are known to occur in the project area are addressed on pp. 61-78 and 88-89 of the EA. |

| <b>Commentator</b>  | <b>Comment</b>   | <b>How or Where Comment is Addressed</b>   |
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| <b>Biodiversity Associates/Black Hills Sierra Club</b><br>(continued) | An EIS is necessary to fully analyze and assess the...effects to the following...State of South Dakota and Wyoming listed species...   | The project area is entirely in Wyoming. Effects on species listed by the State of Wyoming are addressed on pp. 79 and 90 of the EA.   |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Northern flying squirrel...   | Because northern flying squirrel is not considered threatened or endangered, or sensitive in the Rocky Mountain region of the Forest Service, and is not a Forest Plan management indicator species, it is not addressed in the EA.          |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Atlantis fritillary butterfly...  | Because the Atlantis fritillary butterfly is not considered threatened or endangered, or sensitive in the Rocky Mountain region of the Forest Service, and is not a Forest Plan management indicator species, it is not addressed in the EA. |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Black bear...   | There is no evidence that a population of black bears exists in the Black Hills.   |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Native fish species...  | There is very little surface water in the project area and no fish-bearing streams (EA pp. 79, 93).  |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Management Indicator Species...   | Effects on Management Indicator Species are addressed on pp. 79-87 of the EA.  |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Sand Creek Roadless Area...   | Sand Creek is outside the Cement project area. The project area does not drain into the roadless area.   |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Water quality...  | Effects on water quality are addressed on p. 96 of the EA.   |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Riparian areas...   | Effects on riparian areas are addressed on p. 97 of the EA.  |
|   | An EIS is necessary to fully analyze and assess the...effects to the following...Late successional habitat...  | Effects on late succession forest are addressed on p. 56 of the EA.  |
|   | The EIS must fully analyze the following alternatives: An alternative that does not provide commercial timber. This alternative is fully within the scope of the purpose and need as it may “enhance wildlife habitat” or “reduce fuel buildup”.   | The no action alternative would provide no commercial timber. The alternatives considered in detail address all aspects of the purpose of and need for action.   |
|   | The EIS must fully analyze the following alternatives...An alternative that decommissions the maximum amount of roads possible within the project area. This alternative is fully within the scope of the need...The Forest Service must provide information and analysis that supports any figure that represents the maximum amount of roads that can be decommissioned. | This alternative was considered but eliminated from detailed study for reasons given on p. 37 of the EA. The Cement Project Area Roads Analysis Report (in the project file) documents transportation system management proposals.           |

| <b>Commentator</b>  | <b>Comment</b>   | <b>How or Where Comment is Addressed</b>  |
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| <b>Biodiversity Associates/Black Hills Sierra Club</b><br>(continued)       | The EIS must fully analyze the following alternatives...An alternative that proposes only prescribed burning. This alternative is fully within the scope of the purpose and need as it “reduces fuel buildup”.   | This alternative was considered but eliminated from detailed study for reasons given on p. 37 of the EA.  |
|   | The EIS must fully analyze the following alternatives...An alternative that proposes to designate all management area prescription (“MAP”) 5.1 within the project area as MAP 4.1. This alternative proposes a nonsignificant forest plan amendment and is fully within the purpose and need as it “enhances wildlife habitat”.  | This alternative was considered but eliminated from detailed study for reasons given on p. 37 of the EA.  |
|   | The EIS must fully analyze the following alternatives...An alternative that proposes no fuels treatments. This alternative is fully within the purpose and need as it “enhances wildlife habitat” by preserving down woody debris and snags in the Cement project area.  | This alternative was considered but eliminated from detailed study for reasons given on p. 37 of the EA.  |
|   | ...the agency is further endangering the continued existence of many native species on the BHNF [by proposing the Cement project].   | Effects on all species that may or are known to occur in the project area are addressed on pp. 60-91 of the EA. No significant direct, indirect, or cumulative effects are expected to occur.   |
| <b>Black Hills Forest Resource Association</b><br>(signed by Aaron Everett) | There is nothing in the Forest Plan that directs the Forest Service to “assume presence” of goshawks during project analysis.  | This direction is found in Forest Service Manual Supplement 2600-2001-1 (Black Hills National Forest).  |
|   | We have and will continue to oppose any management activity pertinent to the interpretation of Black Hills Forest Service Manual Supplement #2600-2001-1, sections 2672.101-103 which suggests that the Black Hills National Forest should “assume presence” of goshawks where nesting territories are not currently known...The scoping notice states that several northern goshawk nests are known to exist within the Cement Project Area; if survey data have confirmed the existence and location of these nest sites, we believe this constitutes knowledge of goshawk territory and therefore eliminates the need to “assume presence” of goshawks in other portions of the Project Area perceived as suitable PFA habitat. | Several goshawk nests are known to exist in the project area. Two areas of at least 5,000 acres are not covered by the territories associated with these nests and the territories associated with nests adjacent to the project area. These are the areas to which FSM Supplement 2600-2001-1 applies. The most suitable nesting and PFA habitat was identified in these areas. See EA p. 61-63. |

| <b>Commentator</b>   | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>   |
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| <b>Black Hills Forest Resource Association</b><br>(continued)  | We direct your attention to Forest Plan Objective 201... Our primary concern is that the Forest seemed to have fulfilled much of the requisite 10 percent increase in hardwood communities through project decisions in the period of time directly antecedent to the Revised Forest Plan's finalization; it would seem that this requirement has been fulfilled for the duration of the planning period. We further request that planned activities such as liberation cuts are appropriately mated with site qualities that favor hardwood communities over pine communities. | Proposed liberation cuts are more accurately termed "aspen enhancement" in the EA. Acreage of this treatment proposed under Alternatives 2 and 3 is less than the amount in the original proposed action. See EA p. 16 for discussion of reasons for the reduction and purpose of the treatment. |
| <b>Cheyenne River Sioux Tribe</b><br>(signed by Bronco LeBeau)   | Supports proposed actions, has no concern regarding adverse impacts to cultural resources   | No action necessary.   |
| <b>Crook County Board of Commissioners</b><br>(signed by Mark Semlek and by Connie Tschetter for Anita Fish) | We concur that the after effects of last spring's snowstorm have resulted in hazardous conditions... We do recommend that prescribed burns be used only when the objective is clear and cannot be accomplished mechanically.  | Alternative 3 includes fewer acres of prescribed burning than the proposed action (EA p. 23).  |
|  | Thinning stands from below should not be done unless there is absolutely no other prescription at your disposal to accomplish the desired result.   | Thinning from below means removing the smaller stems from a forest stand to improve growing conditions for the larger trees. This is a standard silvicultural practice. The intent of the comment is not entirely clear, as no reason is given for the request.                                  |
|  | We also recommend that before any stands are removed from prescription due to snag retention, a survey of snags across the landscape be done, rather than a survey of just the stands proposed for management. Looking at the "bigger picture" is a much more realistic approach to snag management.  | No stands were removed from treatment consideration for snag-related reasons. See EA pp. 56-58.  |

| <b>Commentator</b>   | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>   |
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|  | <p>We understand that many of the roads proposed for obliteration represent a threat to the environment because they have been established in sensitive areas...Such is the case with [U]725 and [U]763. Unfortunately these roads also represent the only viable circulation and access in the general area for all uses, recreation, fire control, timbering and ranching...We suggest that the Forest Service plan and implement a program to design and establish road access to this area...in places that are not as sensitive and prone to erosion. If roads of this nature were constructed, the existing roads that now occupy the sensitive areas can then be obliterated and reclaimed...Until such time as the Forest Service is able to implement a program as described above, we must oppose the obliteration of the two roads referenced above for the reasons stated. We also oppose the decommissioning of Forest Service road 850.2 near Cement Ridge tower.</p> | <p>Alternative 3 would re-route U725 out of the wet meadow. Both action alternatives would narrow 850.2 to an ATV trail (EA p. 17-18).</p>   |
| <p><b>Crook County Land Use Planning &amp; Zoning Commission</b><br/>(telephone call from Linda Tokarczyk)</p> | <p>Would the proposed project affect access to mineral claims?</p>  | <p>Effects on mineral claims are addressed on p. 104 of the EA.</p>  |
| <p><b>Nancy Hilding</b><br/>(telephone call)</p>   | <p>Develop a foot trail from Cement Ridge to Sand Creek.<br/>Consider designating areas adjacent to the Sand Creek inventoried roadless area as non-motorized. Develop conditions appropriate for consideration as old growth and non-motorized in the future.</p>  | <p>The suggested trail would be outside the Cement project area.<br/>The no action alternative includes no timber harvest. Alternative 2 would close Management Area 4.1 (the part of the project area closest to the roadless area) to all motorized vehicles.<br/>Alternative 3 would close 4.1 to off-road motorized use.</p> |
| <p><b>Mineral Hill Venture</b> (signed by John Green)</p>  | <p>The proposed actions to “improve forest health, reduce fuel buildup and enhance wildlife habitat” are desirable goals which I would encourage.<br/>The proposed actions to “produce timber and increase livestock forage” are undesirable goals which I would discourage.<br/>In my opinion, the primary goal in any timber cutting should be for the purpose of maintaining and improving the forest and not for economic reasons.</p>  | <p>The action alternatives include these actions.<br/>The no action alternative does not include these actions. The final purpose of and need for action statement (EA p. 10) does not include increasing livestock forage.<br/>Reasons for proposed harvest are addressed on pp. 6-10 of the EA.</p>                            |

| <b>Commentator</b> | <b>Comment</b>   | <b>How or Where Comment is Addressed</b>   |
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|                    | I do not understand how increasing livestock forage and enhancing wildlife habitat complement each other. It seems to me that the livestock pollute the land and water, discourage wildlife, and cause the increased traffic in the area from the cattlemen monitoring their cattle. | The final purpose of and need for action statement (EA p. 10) does not include increasing livestock forage. Livestock grazing is a separate issue not related to this project. Comments were forwarded to District range managers. |
|                    | If the Forest Service is going to increase livestock foraging anyway, then I am in favor of it being done away from our property. One consistent problem that we have had is the cattlement trespassing over our land to get to their cattle.  | Livestock grazing is a separate issue not related to this project. Comments were forwarded to District range managers.   |

| <b>Commentator</b>  | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>  |
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| <b>Mineral Hill Venture</b><br>(continued)                | More important than the closing of decommissioning of roads, to me, is for the Forestry [sic] Service to make the public aware that there are private roads in the area to which neither the Forestry Service nor the public has any right to access...the property is posted "no trespassing"...I believe I have in my files, a copy of the Forestry Service snowmobile map which also labels this as one of the roads open to travel. | Owners of private land may close private roads and report trespass on posted land to law enforcement. The parcels of private land in question are outside the Cement project area, and comments were forwarded to appropriate District personnel. |
| <b>Native Ecosystems Council</b> (signed by Sara Johnson) | 1. Your project design is arbitrary because you only have objectives and goals for vegetation. What are the long-range management plans for wildlife in this area, and how will they be achieved through habitat management? Specifically, what are the habitat management plans for management indicator and sensitive species; what current science and monitoring are they based on?   | Project objectives are discussed on pp. 6-10 of the EA. Long-range management plans for wildlife are part of the Forest Plan process and are outside the scope of the Cement project.   |
|   | 2. What are the snag densities within each structural stage in the project area, and what is the snag recruitment level within each structural stage? Please provide a snag inventory that is meaningful to the public...Please demonstrate how long term snag needs will be met within each structural stage over time.  | There is no reliable, quantitative data on existing snags in the project area. Effects on snags are addressed on pp. 56-58 of the EA.   |
|   | 3. History of goshawk productivity within the analysis area needs to be provided, with an evaluation with the ongoing impacts of timber management based on Forest monitoring.  | There is no data on goshawk productivity in the project area. Effects on goshawks are addressed on pp. 61-63 of the EA.   |
|   | 4. Please provide an analysis of goshawk habitat quality not just in postfledging areas, but across their entire territories. Relate habitat conditions with estimated productivity of these nests.   | Effects on goshawks are addressed on pp. 61-63 of the EA. The Revised Forest Plan directs analysis of habitat across post-fledging areas. There is no data on nest productivity.  |

| Commentator                                     | Comment   | How or Where Comment is Addressed   |
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|   | 5. Please provide a summary of the monitoring data that is available to demonstrate that ongoing timber management has not significantly reduced the viability of MIS and sensitive species on this landscape, or on the Black Hills Forest as a whole.   | Forest-wide monitoring data is available from the Forest Supervisor's office in Custer, South Dakota.   |
|   | 6. Please provide a full summary of the old growth management strategy for this analysis area, and why the Forest believes this strategy will be effective in maintaining viability of associated wildlife within this analysis area. Where will the old growth, replacement old growth, and connecting corridors be, and what is the basis for determining this program will be effective? Please include a summary of old growth characteristics by stand, including number of large trees, snags and downed logs per acre. | There is no defined old growth management strategy for the project area. Characteristics of and effects on old growth forest are addressed on p. 56 of the EA. Effects on species associated with older, dense forest and snags are addressed on pp. 61-67 of the EA.                           |
| <b>Native Ecosystems Council</b><br>(continued) | 7. How will foraging habitat for woodpeckers be provided with this program? If a purpose of this program is to improve forest health, please define how foraging needs of woodpeckers has [sic] been included to ensure their viability. What monitoring data is available to show that your program will not significantly reduce foraging habitat for woodpeckers?  | Effects on woodpeckers are addressed on p. 64-67 of the EA. Available forest-wide monitoring data is cited at this location.  |
|   | 8. Will adequate surveys be conducted for wildlife? Please define the time expended on wildlife surveys for this area, including dates surveys were conducted. What level of surveys are believed necessary to determine if particular wildlife species are present, including owls?  | Wildlife surveys are addressed on p. 61 of the EA and in the project wildlife biologist's reports, available on request.  |
|   | 9. Please provide complete information on open road densities during logging and after closures are completed. We would like to know what the level of displacement is on big game species, both before, during and after logging. To do this, we need to know what the open road densities are for the analysis area.  | Effects on open road density are addressed on p. 99 of the EA. Because the sequence and scheduling of potential timber harvest are not known at this time, road density during harvest is not available. Mitigation regarding closure of roads during timber harvest is discussed on pp. 31-32. |
|   | 10. Where will big game security areas be located both in the project and cumulative effects area? Please define where blocks of forest cover over 250 acres and 0.5 miles from an open road are currently located in the project area, and where they will be after the project is implemented. Please define what the impacts are on wildlife based on current and projected security in this landscape.  | Effects on big game security are addressed on pp. 85-86 of the EA. Mitigation to reduce effects of logging-related road use on big game security is discussed on p. 32.   |

| <b>Commentator</b> | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>   |
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|                    | 11. How is interior forest habitat being managed for wildlife viability? Please define what species may be present that are associated with interior forest habitat, and where this habitat is located before and after the project, and what the expected adequacy is for viability. | Effects on sensitive and management indicator species are addressed on pp. 61-87 of the EA.        |
|                    | 12. We would like to know where hiding cover for big game will be located both before and after the project is completed.   | Effects on screening cover are addressed on pp. 82-85 of the EA. Mitigation is discussed on p. 35. |
|                    | 13. The scoping notice indicates that logging will be done to improve goshawk habitat. Could you include the Forest monitoring data, and current science, that demonstrates that productivity of nests increased when logging was completed?  | Effects of timber harvest on goshawk are addressed on p. 61-63 of the EA.                          |

| <b>Commentator</b>                              | <b>Comment</b>   | <b>How or Where Comment is Addressed</b>   |
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| <b>Native Ecosystems Council</b><br>(continued) | 14. The various management recommendations provided by a panel of wildlife experts that were interviewed for the Phase 1 amendment were not mentioned in your scoping notice. Could you define specifically how this information has been used in your project planning?   | Phase 1 Amendment direction is based on the interviews. Proposed activities would comply with Phase 1 direction. |
|   | 15. The size of your treatment areas appears to be quite large. Could you provide a tabulated summary of the size of each unit, and also summarize the cumulative effects of forest thinning areas from past and planned treatments? Could you discuss the impact of these large units on wildlife, including the goshawk? | Cumulative effects on vegetation and wildlife are addressed on pp. 47-48 and 86-87 of the EA.                    |
| <b>Prairie Hills Audubon Society</b>            | Please include in your section on recreational use in [the Cement EA] the recreational use of bird or wildlife watching.   | Effects on recreational uses of the project area are addressed on pp. 103-104 of the EA.                         |

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| (signed by Nancy Hilding) | We are opposed to any timber treatments within the Sand Creek Roadless Area – with that Area defined by boundaries as proposed by the conservationist community, not the boundaries proposed by the Forest Service...In an area outside but surrounding the current Sand Creek Roadless Area and at least including areas which were once part of the original Sand Creek Roadless RARE II boundaries, a buffer area should be maintained as a buffer pristine and primitive area around a future wilderness core. In this surrounding buffer area roads should be reduced and no timber harvest that removes large old yellow barks pines or makes a significant change in the wild appearance of the surrounding area should be allowed. | The Sand Creek inventoried roadless area is outside the Cement project area. The “original Sand Creek Roadless RARE II boundaries” may include the northeastern part of the project area. The Forest Plan allocated this area to Management Area 4.1 (limited motorized use and forest products), where timber harvest is allowed. Alternatives 2 and 3 would close most or all roads in MA 4.1. Alternative 1 would conduct no timber harvest in MA 4.1. |
| <b>Marlene Simons</b>     | I don't like the Forest Service continuing to close more and more roads on the Black Hills NF. Many people use the roads in the project area throughout the year. Any proposed road closures or decommissioning of any roads should include specific reasons as to why the Forest Service believes that closure/decommissionings are necessary, a thorough analysis of the impacts of those closures/decommissionings on future management of the Forest and on public use of the Forest, and an alternative that does not include any additional closures/decommissionings.   | Alternative 1 would not close or decommission any additional roads. Alternative 3 would close or decommission fewer roads than the proposed action. Reasons for closures proposed under Alternative 2 or 3 are given in the EA (pp. 17-18) and the Roads Analysis Report prepared for the project area. The Roads Analysis took into account the need for access for future management of the forest.   |

| <b>Commentator</b>                   | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>  |
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| <b>Marlene Simons</b><br>(continued) | I agree with your assessment of the storm damage, but am very concerned about how many years it will be before the Forest Service cleans up the storm damage under this process. Why can't you proceed with the fuels treatments this year instead of waiting for a lengthy analysis? | Treatment of some of the storm damage in adjacent areas has already been analyzed and completed under other decisions. Fuel treatments proposed under Alternatives 2 and 3 could begin in late summer or early fall 2003. |

| <b>Commentator</b>   | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>   |
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|  | <p>I am very uncomfortable with the proposed patch clear-cuts on nearly 500 acres and how that will affect long-term management of this area, and I recommend that you re-assess your proposal for these patch clear-cuts. I would also like a good explanation of the need for the “liberation cuts”, and why these areas will no longer be managed for ponderosa pine.</p>  | <p>Many of the patch clearcuts included in the original proposed action were dropped, including those in the currently active Wish timber sale (to avoid contractual complications) and those on steep slopes that were found to have unstable soils. Alternatives 2 and 3 propose 92 acres of patch clearcuts. Proposed liberation cuts are termed “aspen enhancement” in the EA. Acreage of this treatment proposed under Alternatives 2 and 3 is less than the amount in the original proposed action. See EA p. 16 for discussion of reasons for the reduction and purpose of the treatment.</p> |
|  | <p>Finally, I am very concerned about the fuel loading and fire risk and the potential for mountain pine beetle outbreak in the Sand Creek Roadless Area and the risk to national forest resources and to adjacent private landowners. The situation in Beaver Park could easily be a preview of what will happen in Sand Creek without some aggressive management, and I ask that you propose treatments in the Sand Creek Roadless Area that would reduce the risk of mountain pine beetle and fires.</p> | <p>The Sand Creek inventoried roadless area is outside the Cement project area. It is included in the Welcome/Sand project, scheduled for decision in 2003.</p>  |
| <p><b>Wes Thompson</b><br/>(visited, written comments)</p> | <p>[Cement and Welcome/Sand] projects could create fire control corridors to greatly reduce the risk of catastrophic fire destroying the natural resources of this area and jeopardizing housing developments and historic ranches to the north.</p>  | <p>Cement Alternatives 2 and 3 include fuel reduction proposals (EA pp. 16-17 and 23).</p>   |
|  | <p>I would like to encourage range and wildlife staff to work closely to make the most of [K-V] funds.</p>  | <p>Comment was forwarded to appropriate District personnel.</p>  |
|  | <p>In favor of timber harvest and prescribed burning proposals.</p>   | <p>No action necessary.</p>  |
| <p><b>Ron Watson</b><br/>(telephone call, visited)</p>     | <p>Prefers gates to decommissioning so roads can be used later.</p>   | <p>Alternative 3 would decommission fewer roads than the proposed action and would use gates to close some roads that the proposed action would put into storage (EA p. 23). The project Roads Analysis took the need for access for future management into account.</p>   |
| <p><b>Ron Watson</b><br/>(continued)</p>                   | <p>Supports narrowing roads rather than complete obliteration so cattle can use as trail.</p>   | <p>Livestock access will be retained where needed and feasible (EA p. 30).</p>   |

| <b>Commentator</b>  | <b>Comment</b>  | <b>How or Where Comment is Addressed</b>   |
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|   | Unclassified road U680 goes through Mr. Watson’s property. It’s part of the snowmobile trail system in winter. There is no public right-of-way at other times of year, but ATV users trespass and cause damage.   | U680 is entirely on private land. It connects two roads that are under Forest Service jurisdiction. One of these roads would be gated year-round under both action alternatives, and a closure could be placed at the intersection with the other road. Concerns about the snowmobile trail system and trespass by recreational drivers was forwarded to the appropriate District personnel. |
|   | Unclassified roads U725 and U763 are rutted and in bad shape.   | These roads would be decommissioned under Alternative 2 and partly re-routed under Alternative 3.  |
|   | Not in favor of closing roads that allow access to spring developments that need maintenance.   | All water developments would still be accessible under all alternatives. Some may be accessed by roads that would be closed year-round; these roads would be closed with gates rather than stored so that access for maintenance activities is retained.   |
|   | In favor of prescribed burning.   | Prescribed burning proposals are discussed on pp. 16-17 and 23 of the EA.  |
| <b>Wyoming Department of State Parks &amp; Cultural Resources, State Historic Preservation Office</b> (signed by Judy Wolf) | Management of cultural resources on Black Hills National Forest projects is conducted in accordance with Section 106 of the National Historic Preservation Act and Advisory Council regulations 36 CFR Part 800. These regulations call for survey, evaluation and protection of significant historic and archeological sites prior to any disturbance. Provided the Black Hills National Forest follows the procedures established in the regulations, we have no objections to the project. | Effects on cultural resources are addressed on pp. 106-107 of the EA.  |
| <b>Wyoming Game and Fish Department</b> (signed by Bill Wichers)  | The Environmental Assessment should include a section on cumulative impacts...  | Cumulative effects are addressed for each resource area (EA chapter 3).  |
|   | The project area contains high quality habitat for elk and provides abundant recreational opportunities for elk hunters in the fall. The Environmental Assessment should disclose how the proposed management actions will impact elk habitat and recreational opportunities.   | Effects on elk habitat and recreation, including hunting, are addressed on pp. 84 and 103-104 of the EA.   |
|   | The scoping document states that there are several known northern goshawk nest sites in the project area and that quality foraging sites are lacking. Current levels of goshawk foraging habitat should be disclosed as part of the evaluation of the necessity of thinning to improve that habitat.  | Effects on goshawk habitat are addressed on pp. 61-63 of the EA.   |

| Commentator  | Comment  | How or Where Comment is Addressed   |
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| <b>Wyoming Game and Fish Department</b><br>(continued) | We are most concerned about protecting [the headwaters of Sand Creek] from erosional impacts which may lead to increased downstream sedimentation. We offer the following suggestions for the Forest Service to consider in the environmental document:<br>1. Construction of water bars, contour falling of trees, strategic location of slash/debris piles and other similar techniques would be effective means of controlling soil erosion.  | Effects on soil erosion are addressed on p. 95 of the EA.   |
|  | 2. Where on-site inspections have verified the water repellency of soils in severely burned areas...   | There are no severely burned areas in the Cement project area. Proposed prescribed burns are described on pp. 17, 21, 23, and 25 of the EA.                             |
|  | 3. Emergence of vegetation following any burn may serve as an attractant to domestic livestock...livestock use of the burn area should be curtailed until recovery monitoring shows that it can safely support grazing...  | There are currently no recently burned areas in the Cement project area. Mitigation and effects of prescribed burns are addressed on pp. 28, 31, and 100-101 of the EA. |
|  | 4. Buffer zones of undisturbed vegetation should be left along each side of standing waters and water courses to minimize sedimentation and direct fish habitat impacts...   | There is no fish habitat in the project area (EA p. 79). Effects on sedimentation are addressed on pp. 95-97 of the EA.   |
|  | 5. Slash control and disposal should be completed in a manner that minimizes the occurrence of debris entering stream courses.   | Effects on stream courses are addressed on p. 96 of the EA.   |
|  | 6. Any road construction or reconstruction completed as a part of this project should be designed and completed in a manner that minimizes soil erosion.   | Effects on erosion are addressed on p. 95 of the EA.  |
|  | 7. All stream channel crossings (intermittent and perennial) should be located in areas and constructed in ways which do not decrease channel stability or increase water velocity.  | No intermittent or perennial stream channels would be crossed (see EA p. 96).   |
|  | 8. Log landings should be located in areas and developed in ways that minimize potential sedimentation impacts to downstream waters. Specifically, we recommend that a) the size of landings be the minimum necessary...b) landings be located in areas where slope is less than 10 percent, c) landings be located in areas where logs are not skidded across stream channels or riparian areas, d) landings be located outside of riparian or buffer areas, e) landings be located to minimize the number of tractor roads needed and where skid road approaches are as level as possible, and f) landings be designed to drain in a planned direction and manner to minimize sedimentation to stream courses. | Timber harvest mitigation is addressed on pp. 28-35 of the EA. Effects on sedimentation are addressed on p. 95 of the EA.   |

| <b>Commentator</b>  | <b>Comment</b>   | <b>How or Where Comment is Addressed</b>  |
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| <b>Wyoming State Forestry Division</b><br>(signed for Thomas Ostermann) | In dealing with small diameter timber utilization issues, I recognize a need to make small diameter material available for harvest...By specifically listing the expected volumes of [trees, limbs and tops less than 7 inches in diameter] that will be removed, a response may be initiated from the potential users of small diameter material and will provide a basis for planning on the part of the users...I think the appropriate path is recruiting the emerging small diameter timber industry based on the wood that a forest can produce in a sustainable manner. | Expected volume of roundwood is addressed on pp. 14-15 of the EA. The Black Hills National Forest is continuing to work to find new markets for small-diameter material. These comments were forwarded to the appropriate Forest personnel. |