



Black Hills National Forest
1997 Revised Land and Resource Management Plan
Phase II Amendment
Analysis of Public Comments from Scoping

CAT
Content
Analysis
Team

Content Analysis Report

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Narrative Summary

Introduction

Each national forest in the United States is governed by a Forest Plan. The Forest Plan makes broad determinations regarding the use of forest resources, establishes forest-wide multiple-use goals and objectives, and establishes management areas and management area prescriptions applying to future activities. The Plan ensures compliance with relevant federal statutes, and is arrived at through expert analysis and public input in accordance with the National Environmental Policy Act (NEPA).

In 1982, the Black Hills National Forest completed its first Forest Plan. The National Forest Management Act requires periodic revision of each Plan, and in 1997 the Black Hills National Forest completed, and the Regional Forester approved, a Revised Forest Plan. Aspects of the Revised Forest Plan were appealed and related actions litigated; portions of the appeal were remanded to the Black Hills National Forest for further action, and the litigation was settled. Together, these processes resulted in the Black Hills National Forest: (1) completing an interim amendment to the Forest Plan to immediately address contested issues in the Revised Forest Plan (the Phase I Amendment); (2) initiating a more lasting and comprehensive effort to address contested issues in an additional amendment to the Forest Plan (the Phase II Amendment). This document deals with the initial (scoping) stage of the Phase II Amendment.

On November 21, 2001, Black Hills National Forest Supervisor John Twiss published in the Federal Register a Notice of Intent to prepare an Environmental Impact Statement (EIS) disclosing the effects of amending the 1997 Revised Forest Plan. The Forest Service stated that this Phase II Amendment will “provide additional management direction to adequately provide for species diversity and viability.” The Notice of Intent outlined the scope of the Phase II Amendment as defined by the appeal decision and litigation settlement, identified several initial issues to be considered in the accompanying EIS, and established a comment period of 60 days for interested parties to provide direction to the agency.

411 responses were received during the comment period. In addition, the Forest leadership team decided to incorporate within the present analysis five responses submitted by government partners outside of the comment period. This decision is based upon recognition of special collaborative status accorded to Federal, State, and local partners.

This report provides (1) a narrative review of concerns raised during scoping; (2) a comprehensive list of public concerns, forming the basis for and supplementing the narrative summary; and (3) a series of appendices detailing the process for reviewing public comments, analyzing demographic information derived from responses, and listing individuals responsible for the present analysis. The narrative summary provides an overview of concerns rather than a comprehensive description of each public concern. The summary is designed to provide context, depth, and connection to the listed public concerns—which are designed to systematically identify specific, coherent concerns and suggestions raised by respondents. The narrative summary comprises three main sections: Planning and Policy, Consideration of Alternatives, and Affected Environment.

Planning Process/Purpose and Need

The Phase II Amendment of the Black Hills National Forest Land and Resource Management Plan is anticipated to be a significant amendment, focusing on changed conditions and demands in relation to species viability and diversity. This point alone results in several comments on how the Forest Service should be re-examining goals and objectives. While some believe the recent Undersecretary of Agriculture's direction sets new and overriding guidance as to how specific biodiversity goals should be included in current forest planning, others are concerned that the species viability focus (the issue that precipitated the Amendment process) will be lost or minimized. The latter go on to request that the Forest Service avoid including effects to logging and recreation industries in the Phase II Draft Environmental Impact Statement (DEIS) and explicitly proclaim the maintenance of viable species as the only purpose and need for the proposed action. Other conservation groups would like assurance that if this occurs, and viable species populations do receive a great deal of consideration in the management of the Black Hills National Forest, that the health of their populations would not somehow be connected to impacts to local economic interests. In juxtaposition to this concern a state agency contends that Forest Plan goals and objectives, while adhering to applicable laws and regulations, should be "based as closely as possible on local conditions and uses." In other words, they would like the Forest Service to analyze and protect the economic and cultural qualities of local forest-dependent communities while still including the review and designation of Management Indicator Species in the Phase II Amendment planning process. Further, many believe the Black Hills National Forest should expand its list of issues for review beyond the broad range of species viability and diversity to include all possible impacts to ecological health, from roads to wilderness, and especially fire danger and possible bark beetle infestations. However the Black Hills National Forest decides to pursue future goal setting with regards to wildlife species analysis, the public would like the Forest Service to start accomplishing its stated objectives.

The timeline for completion of the Phase II Amendment is consistently noted by timber industry representatives, state and local governments, and area residents who advocate aggressive management. Nearly every respondent that mentions the timeline believes that the Forest Service should strive to advance the completion date of this document. Reasons abound for why the Forest Service should complete the Phase II Amendment in 2002, or 2003 at the latest—from forest health to prior commitments to industry survival. Additionally, some advocates for timely action request that the Forest Service commit to assigning a stable, knowledgeable staff—aware of current, local conditions—to lead the planning process. In direct opposition to those urging a shorter timeline for implementation, the same group demanding that species viability be identified as the sole purpose and need for the Phase II Amendment would like the Forest Service to provide an additional comment period based on such a rearticulated purpose and need statement.

Some local residents would also like to be assured that their input will be adequately evaluated and, possibly, even given primary consideration. The expert interview process and outcome is also a source of concern. Believing this is another way to ensure meaningful public involvement and more up-to-date accurate information about Black Hills' current conditions, one conservation organization would like the Forest Service to conduct new expert interviews.

While timeliness and public involvement play a major role in how many people view the Forest Plan Amendment process, some tend to concentrate on the inclusion of specific information in

forest planning documents. In order for the Forest Plan Amendment to comply with land management statutes, several respondents note that efforts must be taken to acknowledge and adhere to State water quality standards, Nonpoint Source Pollution Management Plans, resource conflicts resolutions, standards and guidelines for monitoring and evaluation criteria, and revised environmental analyses accounting for the environmental changes caused by the fires of 2000 and 2001. Others argue that the Draft Environmental Impact Statement would be more understandable and enforceable if it included and incorporated visual graphic information to help readers understand proposed alternatives and potential changes from current conditions.

Consideration of Alternatives

Reflecting other common sentiments, one conservation organization would like to see goals and objectives specifically defined for Phase II of the Forest Plan Amendment. This, they reason, would allow for the establishment of a reasonable range of alternatives for the DEIS. The U.S. Environmental Protection Agency (EPA) also notes that further public involvement and outreach should be conducted to ensure the range of alternatives will address stakeholder concerns.

Meeting the concerns of the stakeholders through a range of alternatives will entail looking into what respondents request of the Forest Service. One general suggestion provided by some is to develop an alternative with stronger habitat protections than the alternatives considered in Phase I. Noting the general lack of old growth habitat and loss of habitat from the Jasper fire, these respondents believe habitat protection would involve both a decrease in land management activities and an increase in tolerance for large scale disturbances. The EPA also requests that the Forest Service disclose the individual environmental impacts for every management action proposed under each alternative. They believe this would allow the stakeholders and decision makers to interpret the importance of each action on the economy, health of the environment, and other values and users of the forest.

Respondents suggest two main alternatives for inclusion in the Phase II DEIS: Alternative G, from the 1997 Forest Plan, to be used as the baseline and preferred alternative, or the “Restoration Alternative.” Alternative G, proponents state, will meet the intent of the National Forest Management Act and the need for additional species viability analysis; therefore, it should “be considered the preferred alternative unless a more aggressive alternative is developed in regard to forest health.” Conversely, Restoration Alternative proponents would like to see a shift in forest management priorities to one that emphasizes protecting and restoring the native flora and fauna of the Black Hills National Forest. Beyond this dichotomy of alternative preferences, one conservation organization asserts that “an alternative based on the Veteran/Boulder Settlement Agreement provisions for protection of imperiled wildlife species during ground-disturbing activities” must be considered for the Phase II Amendment. Therefore, wildlife experts would be able to share their views on these possible mitigation measures, they claim, and this alternative could be included as a point of reference.

Affected Environment and Environmental Consequences

Respondents provide many suggestions for developing the Phase II Draft EIS and subsequent Forest Plan Amendment with respect to management options and their impacts on the physical,

biological, and social environment. Nearly all of the comments share several commonalities worth noting. First, most respondents believe the Black Hills National Forest is currently unhealthy – though there is considerable disagreement about what is awry in the Forest, and even greater disagreement about how to address it. Second, many respondents discuss their general vision for the future of the Black Hills National Forest rather than focusing on specific elements of the Amendment. Third, there is a general consensus that wildfire management is important.

Significant divisions eclipse these broad agreements over how the Black Hills National Forest should be managed. Considering an initial, broad simplification of sentiments, it is possible to characterize two general schools of thought that unite many who commented. The first school of thought can be described as a philosophy of aggressive management. Respondents in this general category tend to describe overstocking and beetle infestations in the Black Hills National Forest as being of crisis proportions, and they prescribe logging as the solution to these problems. The second school of thought might be described as a philosophy of biological preservation. These respondents tend to describe the future they desire for the Black Hills National Forest in terms of wildlife species diversity and abundance. They seek extensive data and analysis of species range and viability, and tend to describe active management of the Black Hills National Forest as a cause of species decline, rather than a potential method for improving forest health. Respondents in this general category tend to describe wildlife species as the best indicators of ecosystem health, and propose numerous species for inclusion on the Management Indicator Species list.

General Environment and Vegetation

Some respondents believe the Phase II Draft EIS should comprehensively identify and analyze biological resources in the planning area. As an example, the EPA states, “We believe the document should address the diversity and uniqueness of flora and fauna that exists in the analysis area. A review of climatic diversity, topography and ecotones is helpful to identify local biodiversity.” Suggestions for biological analysis also include the request that baseline data be assembled free from assumptions – that is, that the Forest Service begin assessing wildlife species’ presence, range, and viability without assuming that species are either viable or at the extent of their historic range today. And in the same vein, some suggest that the Draft EIS needs to consider the cumulative impacts of the past century’s ecological changes and management, as well as reasonably foreseeable actions.

In contrast, some respondents believe that too much time and energy is being devoted to wildlife study. These citizens argue that wildlife is simply one of the values of the national forest, and that it should be understood in the context of other important forest needs and uses. Put succinctly by one respondent, “The assessment of wildlife species population viability must be weighted equitably within the context of all other multiple uses, meaning that wildlife concerns should not be regarded as trumping all other multiple use objectives.”

There is a frequent correlation between those respondents who perceive wildlife analysis as overly extensive and those who believe that more aggressive logging is needed to address a crisis in forest health. For these respondents, four interrelated comments are frequently made. 1) The Black Hills National Forest is threatened with epidemic-level pine beetle infestations and seriously overstocked with small-diameter trees; 2) the forest health problems present the potential for catastrophic wildfires that will damage economically valuable resources, further diminish forest health, and threaten the lives and property of area residents; 3) logging can effectively address these problems; 4) timely and aggressive action is the only viable option.

These four elements are frequently tied together, for instance, “We need to mechanically remove the trees with the Mountain Pine Beetle problem, also thin the rest of the forest so fire will not have the fuel to get out of hand like it did last summer.”

Some respondents similarly see the Black Hills National Forest in a health crisis, but believe the crisis point is loss of habitat types and biodiversity. These people prescribe a variety of action, but most fundamentally advocate that the Forest Plan Amendment initiate return to natural disturbance cycles. These respondents argue that wildfire, insect outbreaks, windthrow and storm damage are essential to provide varied forest structure and habitat niches – additionally arguing that human management efforts are counter-productive. One respondent succinctly declares, “We ask you to allow natural processes such as wildfire and insect outbreaks to provide wildlife habitat and ensure long-term forest health. Logging or spraying chemicals cannot replicate natural processes.”

For many respondents, the threat of fire to life and property is real, but logging is a poor way to reduce that risk. According to these respondents, “The likelihood that a home will ignite is almost entirely determined by the landscape within 40 meters of the building and by the materials and design of the building.” Such respondents ask the Forest Plan Amendment commit resources to homeowner education and assistance in the urban/wildland interface, but believe that logging further than 40 meters from structures provides few fire prevention benefits.

Post-fire activities receive much attention, particularly management of recent burns like the Jasper Fire. Opinions run the policy gamut: several people suggest that it is critical to return the Jasper area to the purposes described in the current Forest Plan as quickly as possible, making the area available again to logging and recreation of all types; others individuals suggest that the Jasper area should now be managed as wilderness or left alone. Several respondents request additional environmental analysis and public input before activities are resumed in the area. Hoping for regeneration of aspen in the Jasper area, many constituents are concerned that grazing by both livestock and ungulates may inhibit growth; thus, they request efforts to control ungulate populations and a delay in the resumption of livestock grazing.

Recruitment of new vegetative elements is a central concern of many individuals. The Forest Plan Amendment should halt logging of all old growth forest, according to some, while others argue for restrictions on harvesting of medium-diameter trees to ensure continued old growth recruitment. Believing these elements to be critical to biodiversity, some respondents seek regeneration of hardwoods while others request the protection of existing snags and the recruitment of additional snags. In contrast, some respondents argue that pre-1997 snag estimates are low, and that “the fires and insect epidemics have created a huge number of snags of all sizes.” Several respondents request development of a “Restoration Alternative” that would protect all old growth forests, increase old growth and snag recruitment, and restore natural disturbance cycles in the Black Hills National Forest.

To measure the health of the forest and to determine how management decisions affect biological resources, some respondents request comprehensive monitoring efforts. This is explored more completely through requests for additional Management Indicator Species (addressed under fauna, below), but several respondents make more general requests. For example, the EPA requests attention to “types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in project implementation, and availability of results to interested and affected groups.”

Soils and Water

Several respondents express concern regarding impacts to soils and caves, particularly in the wake of the Jasper and other fires. Respondents ask that the Draft EIS evaluate soil erosion from premature cattle grazing and motorized traffic in burned areas, as well as changes in microclimate and visibility of caves due to vegetation loss.

Protection of water resources is a concern for some respondents, such as the South Dakota Department of Game, Fish and Parks, which states that “The Black Hills National Forest has lost several hundred miles of streams. Many streams that still exist are in poor condition due to loss of streamside vegetation and diversity, loss of beaver, bank trampling and low flows.” Several respondents identify road construction, logging and grazing as potential threats to water quality. One respondent focuses on the protection of wetlands, while another seeks information on seeps and springs. Suggestions focus on identifying current and developing water quality problems, on ensuring that state Water Quality Standards are met, establishing effective monitoring, and modifying management as new information is developed.

Fauna

Wildlife management and preservation receive considerable attention from respondents. Some people believe that, in fact, wildlife management already receives too much time and attention, to the detriment of other forest resources. As one organization asserts, “There needs to be balance when assessing wildlife population viability – concerns about wildlife should not preclude consideration of other important aspects of the Forest such as multiple uses objectives and the overall health of the Forest.” The Draft EIS base analysis of species health on information only directly relevant to the Black Hills, according to these respondents.

Citizens with other views envision a Black Hills National Forest direction focused on current and long term species survival. These respondents suggest that the Forest Plan Amendment should set goals and objectives ensuring that all native wildlife species have populations that are viable and well distributed – that is, populations of sufficient size to perpetuate themselves in the face of disturbance and habitat change. Further, this viewpoint continues, the Phase II Draft EIS should analyze species’ populations based on, as one organization writes, “up-to-date and accurate information about historic and current population status, trends, and distribution in relation to the planning area, and assess viability with reference to anticipated changes in the quantity, quality, and distribution of specific habitat components.” Several individuals and organizations provide specific suggestions of species whose status should be analyzed and tracked, ranging from mammals to native fish to land snails.

In addition to these general requests for maintenance of species viability and distribution, several respondents request additional designations to the Management Indicator Species (MIS) list. MIS comments include specific suggestions related to the prairie dog and Northern flying squirrel, but also include suggestions of appropriate species-types designed to monitor the health of particular aspects of the Black Hills ecosystem, including but not limited to: non-fish aquatic species, snag indicator species, downed woody debris indicators, montane grassland indicators, post-fire indicator species, and water quality indicator species. The Forest Plan Amendment, some suggest, should include population and habitat management goals for each designated MIS, as well as detailed plans for monitoring.

Threatened, endangered, and sensitive wildlife species are the focus of some comments, including requests for analysis of species status and habitat for the gray wolf, prairie dog, Northern goshawk, and others. Several letters extensively detail the type of habitat necessary to sustain the goshawk. Various respondents believe that the Draft EIS should consider efforts to restore species that have been locally extirpated, such as the bison, gray wolf, otter, and grizzly bear. Healthy black bear populations are a subject of considerable interest, as some forest constituents contend that black bears survive in the Black Hills and should not have been removed from the MIS list, while others call for the bear's reintroduction.

Those voicing concern for wildlife species preservation frequently request that the Forest Plan Amendment take concrete steps to protect biodiversity, such as converting environmentally protective goals and objectives in the Forest Plan into standards and guidelines. Suggestions vary, but this direction is typified by a preservation/conservation organization's argument that "for all native and desired non-native species affected, the Phase II Amendment must include goals, objectives, standards, guidelines and mitigation measures for protection and restoration of a sufficient quantity, quality, and distribution of specific habitat components or characteristics important to species survival, reproductive success, and ability to move and interact." Some respondents request the development and maintenance of necessary habitat through natural processes. They likewise request development of a "Restoration Alternative" that captures this emphasis on preservation of biodiversity.

Special Areas

Regarding special management designations, such as wilderness recommendations and Research Natural Area (RNA) designations, respondents provide a variety of suggestions. One set of perspectives suggests that consideration and designation of additional special management areas should be extremely limited. For example, a multiple use/land rights organization states, "We oppose additional wilderness and Research Natural Area designations coming out of the Phase II process." Specific scientific needs and projects should be identified before RNAs are evaluated, some argue. In opposition, other citizens request that additional RNAs be designated to protect premier examples of native plant communities, geological features, and other characteristics, and provide an extensive list of areas they believe ought to be protected. Potential RNA sites should be protected from human impacts until their status is determined, several argue.

Beyond RNAs, numerous respondents request that the Forest Plan Amendment protect all roadless areas of more than 1,000 acres from logging, roadbuilding, livestock, and off-road vehicle use. These people see roadless areas as reservoirs of biological diversity and natural processes, and a number of them also request that the Phase II Draft EIS incorporate a new inventory of the planning area for all roadless areas of 1,000 acres or greater. Frequently specific suggestions were offered for areas the Black Hills National Forest should recommend for wilderness designation, such as Sand Creek, Pilger Mountain, the Jasper fire area, as well as additions to the Black Elk Wilderness. Once again, a "Restoration Alternative" is suggested as a means to address protection of roadless areas, native plant communities, and special areas such as RNAs.

Travel and Recreation

In regard to roads and recreation, several respondents focus on the need to maintain roads to provide access to the Black Hills National Forest. Contrasting views suggest that there are currently too many roads and off-road vehicle routes in the forest, causing negative impacts on other recreationists and on wildlife. To address this, some suggest prohibiting future road construction, obliterating unnecessary roads, or limiting off-road vehicle use, on- and off-trail. Some individuals request that the Phase II Draft EIS analyze the direct, indirect, and cumulative travel management effects on species viability and diversity. Several respondents hope the Forest Plan Amendment will produce a travel plan more focused on addressing both wildlife needs and real needs for motorized access.

Social, Economic, and Cultural Considerations

On logging, sentiment is fiercely divided. Several respondents suggest that the Forest Plan Amendment limit logging. To this end, some suggest eliminating extractive uses of the Black Hills National Forest, reducing Allowable Sale Quantity in order to account for timber volume lost to wildfire, or conducting additional analysis in the Phase II Draft EIS of cumulative logging impacts. Others additionally request a commitment by the Forest Service to complete an EIS for any subsequent extractive project. Some who question the impacts of extractive activities argue that recreation is more important economically than logging and grazing, and that the Draft EIS should focus on the adverse economic effects of logging, such as increased wildfire risk, competition with private timberlands, road maintenance costs, and increased water purification costs.

Numerous respondents, to the contrary, connect resource extraction to the health of communities near the Black Hills National Forest. These respondents ask that the Phase II Draft EIS carefully consider the social and economic impacts of any decisions on local communities, and argue that the Forest Plan Amendment should give primary consideration to meeting the needs of local communities. These citizens suggest that the timber industry is a critical factor in the culture, custom, and economy of the Black Hills, and that reduced or delayed logging would jeopardize the timber industry and harm local communities.

Concerns about grazing and range management primarily focus on the sufficiency of analysis and monitoring. Some respondents request that the Phase II Draft EIS include cumulative effects analysis and a comprehensive review of range health and management, while others ask pointed questions regarding the status of Allotment Management Plans on the Forest. Different respondents also request different changes in range management direction, respectively suggesting that livestock should be eliminated wherever vegetative health (such as aspen regeneration) is at issue, and in contrast that "AUM's should be maintained at a steady level to provide stability for our ranchers."

No Native American tribes provided official comments on the proposed Phase II Amendment. However, several respondents suggest that Forest Plan direction needs to account for the cultural and treaty rights of Native Americans.

Conclusion

Respondents to the scoping notice for the Phase II Amendment hope that the Amendment and its analysis will address a wide variety of concerns. In addition to those who describe topics that they believe deserve extensive evaluation and analysis in the Draft EIS, there are two main themes that characterize public sentiment. The foundation of the first theme is a belief that the Black Hills National Forest is overstocked with small trees and infested with an epidemic of bark beetles. Respondents articulating this broad theme describe a forest health crisis threatening imminent harm to public and private property through wildfire and insect kill. These respondents call for a quick decision on the Phase II Amendment, believe that logging on the Black Hills National Forest is critical to the economic and social health of local communities, and argue that logging will improve forest health.

The second main theme of respondents is founded on the belief that the Black Hills National Forest faces a different health crisis—lost biodiversity. Those articulating this theme argue that the Forest Plan Amendment should be focused on protecting viable, reproducing populations of all plant and wildlife species native to the Black Hills. To ensure this, respondents describe actions such as the designation of Research Natural Areas, the protection of roadless areas of more than 1,000 acres, a return to permitting natural disturbance cycles on the Forest, and a system of monitoring and analysis that includes numerous new Management Indicator Species. These respondents request that the Draft EIS include a Restoration Alternative evaluating the policy direction they advocate.

Notice of Intent Comment Period and Governmental Partner Public Concerns

Planning Process/Purpose and Need

PC #: 1

Public Concern: The Phase II Draft EIS should identify maintenance of viable wildlife species populations as the sole purpose and need for action.

We object to the Forest's failure to stress that the purpose and need of this significant Amendment is to bring the Revised Plan into compliance with federal laws and regulations regarding maintenance of viable populations of wildlife species. This amendment should not include effects to the logging and industrial recreation industries. These industrial abuses of the Black Hills National Forest are incompatible with maintaining minimum wildlife conditions, and the Forest Service should not be fomenting public input that is contrary to the needed direction of management change. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 2

Public Concern: The Forest Plan Amendment goals and objectives should be based on local conditions and uses.

We encourage the Forest Service to localize goals and objectives to the BlkHNF to the greatest extent possible. While we recognize that some degree of consistency between Forests is desirable, and that the goals and objectives must adhere to applicable laws and regulations, the goals and objectives resulting from this Phase II Amendment planning process will be most effective for BlkHNF if they are based as closely as possible on local conditions and uses. (State of Wyoming, Office of Federal Land Policy, Cheyenne, WY – #21)

PC #: 3

Public Concern: The Black Hills National Forest should incorporate the March 29, 2001 Undersecretary of Agriculture's direction for species viability and biological diversity considerations.

With regard to the assessment of species viability, Management Indicator Species, and biological evaluation issues as mandated by the Settlement Agreement and the former Chief's appeal decision, we strongly recommend that the Forest Service also consider the Acting Under Secretary of Agriculture's March 29, 2001 Discretionary Review Decisions on the Arapaho Roosevelt, Routt, and Rio Grande National Forests' Plans, in addition to the requirements of the National Forest Management Act and the National Environmental Policy Act. These decisions provided a great deal of general guidance for the Forest Service regarding the basic principles of viability that have emerged over the years and should be incorporated with the Phase II planning effort. (Wood Products Industry/Association, Rapid City, SD – #4)

The Phase II amendment process is intended to focus on species viability and diversity concerns as directed by the appeal decision of October 12, 1999. These concerns and directions are contrary to and in conflict with the guidance provided by the Undersecretary of Agriculture in March 29, 2001 discretionary review decision on the Land and Resource Management Plans for the Arapaho and Roosevelt, Routt, and Rio Grande National Forests. Since the Undersecretary's directions are more recent and from a higher administrative source, they should control present planning efforts. That guidance clearly indicates that species-specific, quantified, biodiversity goals and directions have no place in a coarse scale forest plan. Forest planning should follow the direction and guidance of the Undersecretary's decision. (South Dakota Department of Agriculture, Pierre, SD – #48)

PC #: 4

Public Concern: The Forest Plan Amendment should account for significant environmental changes caused by the fires of 2000 and 2001 in order to comply with land management laws.

The NFMA forest planning regulations recognize the need for the USFS to ensure Forest Plans are kept current to account for changes in conditions and new information. . . . Accordingly, the Supervisor has violated the RPA, NFMA, and the planning regulations to date by failing to amend the Forest Plan to account for the unforeseen Jasper Fire of 2000 and subsequent fires of 2001 and the significant changes they have caused to the BHNH environment. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 5

Public Concern: The Phase II Draft EIS should broaden and strengthen its list of issues for review.

Game, Fish and Parks expresses concerns with precedent setting, specifically with regard to the following listed issues. We feel the issues we have identified should be elevated to a higher and more rigorous review in light of potential impacts to species viability and diversity, forest and range health and a balance of structural stages. In fact, unless otherwise stated, none of our issues are of first impression. We are on record as stating these concerns with the 1983 Forest Plan and with the 1997 Revised Plan. You will find that for the most part, we have consistently raised the following land and resource management issues for over 20 years. (They are not listed in order of importance.) – Landscape Structural Diversity – Range and Livestock Management – Travel Management – Resource Management and Public Participation Following Catastrophic Disturbances, i.e.: fire, storms, insects – Hardwood and Browse Retention and Restoration – Riparian Area Protection, Water Quality and Yield – Monitoring – Management Indicator Species and Habitat Components – Management Areas – HABCAP Model – BMP Effectiveness (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 6

Public Concern: The Phase II Draft EIS should not include interrelationships between different land uses and management activities in its analysis of environmental impacts.

The issues identified by the Chief’s Appeal Decision and the Settlement Agreement constitute actual environmental “effects” whereas the preliminary effects identified in the Phase II scoping notice – primarily the effects of the Phase II Amendment upon land uses and forest management activities – do not constitute “effects” as defined by Council on Environmental Quality (“CEQ”) National Environmental Policy Act (“NEPA”) regulations. And, although it may be valid to look at the interrelationships or conflicts between different land use and management activities, they are not environmental impacts and do not warrant inclusion into any environmental impacts analysis and do not warrant inclusion into the assessment of the potentially significant environmental impacts of the Phase II Amendment. These errors need to be identified and corrected and the draft environmental impact statement (“DEIS”) for the Phase II Amendment structured and written accordingly. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 7

Public Concern: The Black Hills National Forest should ensure that habitat management goals will not be dependent upon protection of economic interests.

The protections afforded by NFMA implementing regulations and policy direction, especially those relating to species viability and diversity, are not subject to diminished implementation on the basis that they may affect economic interest. Furthermore, compliance with NFMA implementing regulations is not contingent upon habitat management through timber harvest that primarily benefits the timber industry, contrary to the Regional Forester’s assertions. Please note that nowhere in this planning regulation is the maintenance of species viability or distribution within National Forest System Lands connected with economic interests nor is it stated as being indirectly proportional to the risks upon a local timber industry (i.e. when economic risks to the timber industry increase due to management direction, then viability suffers). According to the plain language of this regulation, management of viability and diversity is not commensurate with the risks presented to these aspects of forest management. Rather, it is a requirement that must be met through the planning process and project-level implementation, in and of itself,

regardless of the economic impacts associated with managing for species viability and distribution. . . . Clearly National Forest System Lands are recognized by Congress as containing biological values of equal importance to other values (e.g. timber values, recreational values), that need to be fully protected through the planning process. We hope the USFS, through the Phase II Amendment, meets the plain language of both the NFMA and NFMA regulations. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 8

Public Concern: The Forest Plan Amendment should establish standards and guidelines for monitoring and evaluation criteria.

The Revised Plan and Phase I failed to describe or include monitoring activities such as standards/guidelines. The Revised Plan (IV-1) states in the Monitoring and Evaluation Strategy Chapter that specific monitoring and evaluation criteria (for what resources?) are found in the Monitoring and Evaluation Implementation Guide and that this document can change without amending the Forest Plan. It would appear to us details found in the Guide should be part of the Plan (thus, displayed to the public) and will be more enforceable if armored with standards. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 9

Public Concern: The Black Hills National Forest should advance the completion date of the Phase II Amendment.

The Forest Service has established an unnecessarily long period for the completion of the Phase II Amendment process. The Forest estimates it will complete a draft by September of 2003 and the FEIS by September 2004. This carries the implication that it may be well into 2005 or 2006 before any decision is made to treat the imminent fire hazard and risk that exists in the Beaver Park area, for example. This instance alone is completely unacceptable, but other significant risks exist throughout the Black Hills for which remedial action is apparently not a management priority under Phase I's direction. . . . If you'll recall, although it is not directly reflected in the Settlement language, the most critically important thing the Forest Service brought to the table during Settlement negotiations was a short interim period within which the Forest Plan would undergo amendment. We are dismayed to see the Forest Service apparently attempted to renege on the commitment. (Wood Products Industry/Association, Rapid City, SD – #4)

I am disappointed to hear that you expect the Phase II process will take much longer than anticipated. It is our hope that this process can be expedited, and that the Forest Service develops an amendment that supports multiple use, sustains the forest, and responds to the needs and desires of the people who live near the Black Hills National Forest. (South Dakota Department of Agriculture, Pierre, SD – #48)

COMPLETE PHASE II IN 2003

We understand that this is a complex planning effort which must be done carefully and thoroughly. However, it is our hope that the Record of Decision can be issued in 2003, rather than in 2004. (State of Wyoming, Office of Federal Land Policy, Cheyenne, WY – #21)

There is a real need to accelerate the timeline involved with the Phase II Amendment process. Instead of a target date of Fall of 2004 for the Record of Decision, we feel that the process should be completed by the end of Year 2003, which is still an extension of the Beaver Park agreement. It is imperative to the health of the Forest and the health and well-being of the surrounding Black Hills communities that the amendment process be expedited and active management be resumed as soon as possible. (Crook County Commissioners, Sundance, WY – #57)

COMPLETE PHASE II IN 2002

The USFS NOI states that it could take two to five years to complete the Phase II Amendment. This is unacceptable. In November of 2000, we asked you to stay on your own schedule, which had been outlined in the Settlement Agreement to finish the Phase II Amendment in 2002. Beyond just breaking your word on when this amendment would be finished there are other important issues that cannot take two to five years to complete. (Lawrence County Commissioners, Deadwood, SD – #2)

The amendment must be completed in 2002. . . . If the Sierra Nevada Plan review can be done in 12 months, so can Phase II. The 2/14/2000 version of your Action Plan, sent to the Chief on 10/11/2000, stated that the "Notice of Intent (NOI) for the Phase II amendment will be issued in the winter of 2000-01". The NOI is one year late. From

the standpoint of forest health, the stakes are simply too high to allow the rest of the project to proceed on such a relaxed schedule. (Individual, Belle Fourche, SD – #7)

There appears to be little urgency on the Forest Service's part to complete this process expeditiously. For instance, the public comment period for the NOI is 60 days when 30 days is a more than sufficient and legally adequate length of time. . . . It is tremendously important that the Forest Service complete the Phase II Amendment in 2002. The outcome of this Amendment bears heavily on both the survival of our industry and the health of the Black Hills National Forest. (Wood Products Industry/Association, Spearfish, SD – #13)

As much time, energy and money that has been spent collecting, researching and analyzing data, there is no excusable reason that completion of the Phase II amendment be delayed past the end of 2002. Second, continued delays in treating areas like Beaver Park will exponentially add to the fuel loads that enhance the risk of another large, devastating fire. This risk and additional cost should not be bared by the tax payer because of an inability to implement a plan already approved by the Forest Service. The continued delay of implementing the forest plan will have unprecedented effects on our local economies as well as the timber industry. In conclusion Mr. Twiss, it is imperative that you shed all the distractions and get back to managing our forest. Phase II must be completed by the end of 2002 and no excuses. (Individual, Spearfish, SD – #26)

ANNOUNCE THE ADVANCEMENT OF THE COMPLETION DATE

I am very disappointed with the continual erosion of planning targets especially in regard to the 2004 completion date of the Phase II Forest Plan Amendment. The delay of this document will cause the exacerbation of an already serious insect epidemic in the Black Hills. I ask that you reconsider and publicly state the advancement of the Phase II target completion date. (Wood Products Industry/Association, Hulett, WY – #19)

PC #: 10

Public Concern: The Black Hills National Forest should conduct a new scoping phase based on the Forest Service Chief's interim direction.

The Forest must send out a new scoping notice to all potentially interested parties to clearly delineate the Chief's interim direction and fully explain any changes the Forest Service is proposing to make to the Revised Forest Plan. The Forest Service must provide a new public comment period on the clarified scoping notice for a comprehensive EIS for this amendment. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 11

Public Concern: The Black Hills National Forest should ensure that all local concerns will be taken into consideration.

As work begins on the Phase II Amendment, rest assured that local individuals and communities want very much for you "to protect and restore the health of the land." Your mission of working with local individuals and communities must include listening to those people. (Individual, Belle Fourche, SD – #7)

LOCAL INPUT GIVEN PRIMARY CONSIDERATION

Outside scientific opinions, and for that matter long distance comments, should be reviewed cautiously. The very fact that comments must be sent to Missoula, Montana, for review shows just how little the Forest Service values local input and honestly disgusts me. (Individual, Spearfish, SD – #6)

PC #: 12

Public Concern: The Black Hills National Forest should recognize the benefits of coordinating efforts with stakeholders affected by the Forest Plan Amendment.

Close coordination throughout the Amendment planning process with the Resource Advisory Committee and cooperating agencies may facilitate earlier completion of this Phase II Amendment process. The Wyoming BlkHNF Phase II State/Local Government Working Group and its members are ready and willing to provide what help we can to help the Forest Service. (State of Wyoming, Office of Federal Land Policy, Cheyenne, WY – #21)

This gathering of concerned citizens is committed to assisting the Forest Service in their procurement of whatever resources are necessary to achieve these [Phase II Amendment] ends. (Multiple Use/Land Rights Organization, Deadwood, SD – #50)

PC #: 13

Public Concern: The Black Hills National Forest should examine the effect of employee turnover on achieving long-term forest management goals.

Every time we get a new Forest Service transplant, who is supposedly a specialist, in here, they turn our world up side down by telling us that we are doing everything wrong and then they're gone after 4 years, sometimes even quicker. These specialists do not take the time to even understand how things have been done historically here. They have no respect for the culture and custom. They also have no accountability with their decisions since they will be gone in a short time. A good example of this is a true story of an EA that I looked at several years ago. I looked at an area that a plant specialist was designating for no harvest because it contained numerous, rare plants. Inspection of this area showed that it had been harvested at least twice in the last 80 years (last was about 20 years ago), was heavily stocked and contained mountain pine beetles. There is considerable contradiction here. Do we allow the forest health to deteriorate from bugs? Are these plants here in abundance because of the logging? What will the impact on the plants be if this area burns? Are these plants truly rare? How would logging damage the plants? (Individual, Spearfish, SD – #14)

PC #: 14

Public Concern: The Black Hills National Forest should ensure that staff with local knowledge will be leading the Phase II planning.

It is important that the BHNF address problems sooner than later. It has been over seven months since the BHNF finished Phase I and your agency has not held any Planning team meetings or even has a planning team leader. John, it is important that you get the planning team started as soon as possible and choose someone who has spent sufficient time on the Black Hills to understand the current situation and players. (Lawrence County Commissioners, Deadwood, SD – #2)

PC #: 15

Public Concern: The Black Hills National Forest should conduct a new expert interview process that ensures accuracy and open public review.

While the Forest Service did interview some experts about the BHNF wildlife, and some of the expert interview information will be useful for the Phase II amendment, we believe that before a draft EIS is issued, the Forest Service must conduct a new and open expert interview process; because it appears the individuals who were interviewed by the Forest Service were not given up-to-date and accurate information about the current conditions on the Forest; because the interviews appear to have been prejudiced or handicapped by unreasonably narrow lines of questioning; because citizens were not given the opportunity to oversee the process and ensure its integrity; because the interviews were not recorded or fully documented so it is possible key statements, opinions, conclusions, or recommendations offered by the experts are not reflected in the "Expert Interview Summary"; because no interviews were conducted with experts on snag recruitment and retention impacts for even-aged management and roadbuilding activities; and because the interview process arguably violated the Federal Advisory Committee Act (FACA) since the Forest Service used this process to seek recommendation from people outside the agency. (Preservation/Conservation Organization, Rapid City, SD – #8)

INTERVIEW MORE EXPERTS

The Forest Service should conduct new interviews and seek management recommendations from all experts who have published peer-reviewed scientific studies or a graduate thesis or dissertation on species of concern on the Black Hills. The Forest Service should provide the experts with reliable, current data on habitat conditions in the Black Hills, and the agency should provide the experts with alternatives identified through the scoping process. (Preservation/Conservation Organization, Rapid City, SD – #8)

ALLOW PUBLIC INPUT AND OVERSIGHT

The expert interview process used in the Phase I Amendment process was flawed and must be done over with public oversight and input and with full documentation of expert testimony. . . . All interviews must be recorded, and the public should be given the opportunity to review and comment on questions to be asked of the experts. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 16

Public Concern: The Phase II Draft DEIS should incorporate visual graphic information to help readers understand proposed alternatives and potential changes from current conditions.

Visual information often can be helpful to readers. For example, a map that identifies the geographic location of various resources (old growth, endangered species, range condition, and important archaeological resources, to name a few) is helpful. Forecasted conditions under various alternatives can be displayed alongside existing conditions, to provide a visual characterization of how proposed management practices will affect the environment. That information can include a description of what tree species and types of trees or ecosystems are located in various parts of the Forest and can be displayed visually for both current conditions and proposed alternatives. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 17

Public Concern: The Phase II Draft EIS should ensure compliance with State water quality standards in accordance with the Clean Water Act.

The Clean Water Act's (CWA) goal is to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Existing State Water Quality Standards (WQS) applicable to the affected water bodies provide a basis to determine whether beneficial uses will be protected and water quality standards met. The EIS must demonstrate that project implementation will comply with State WQS. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 18

Public Concern: The Black Hills National Forest should adjust Forest Plan provisions to accommodate state concerns pertaining to Nonpoint Pollution Management Plans.

A discussion of area developments, geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to water quality, aquatic habitat and other resources from the implementation of specific alternatives. Section 319 of the CWA requires that Federal actions be consistent with State Nonpoint Pollution Management Plans. The Federal consistency provisions of Section 319 represent an opportunity for State and Federal agencies to more closely coordinate their activities and cooperate in achieving water quality goals. If a state determines that a Federal project is not consistent with the provisions of the non-point source pollution program, the Federal agency must make efforts to accommodate the State's concerns. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 19

Public Concern: The Black Hills National Forest should resolve resource conflicts created from the Fort Laramie Treaties before making any further resource commitments.

The Forest must not once again fail to use the NEPA process to resolve conflicts over resources resulting from the land claims of the signatory tribes to the 1851 and 1868 Fort Laramie Treaties. This significant Amendment requires a full Environmental Impact Statement to resolve these conflicts and to document needed protections for mountain grasslands, northern goshawk, and snag-dependent species. We request that these concerns be fully considered in a draft EIS before any further resource commitments are made on the Black Hills National Forest. (Preservation/Conservation Organization, Rapid City, SD – #8)

Consideration of Alternatives

PC #: 20

Public Concern: The Black Hills National Forest should define goals and objectives specifically for Phase II in order to establish a reasonable range of alternatives.

The NOI seems to indicate that goals and objectives for certain management activities and land uses are already in place and the Phase II Amendment environmental analysis will determine the potentially significant impacts upon these goals and objectives. In selecting preliminary goals and objectives, the USFS is unreasonably limiting the choice of reasonable alternatives available for analysis under the Phase II Amendment, in violation of NEPA regulations. . . . The erroneous preliminary issues (or effects) identified in the NOI seem to indicate a predecisional limitation of reasonable alternatives and indicate the agency will not rigorously explore and objectively evaluate reasonable alternatives for the Phase II Amendment. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 21

Public Concern: The Black Hills National Forest should conduct extensive public involvement to develop an adequate range of alternatives.

Extensive public involvement and outreach should be conducted to provide a range of alternatives that address stakeholder concerns. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 22

Public Concern: The Black Hills National Forest should develop and implement an alternative with stronger habitat protections than the alternatives considered in Phase I.

The Forest Service's Phase I alternatives failed to account for the current lack of old growth and goshawk nesting habitat, and for the significant losses of these key habitats caused by the Jasper Fire. For the Phase II amendment, the Forest Service must therefore develop and implement an alternative that has much stronger protections than either of the Phase I alternatives. This new alternative must, at the very least, provide all of the protections identified in these comments, including direction to allow no further degradation or loss of habitat for the species of concern. The Forest Service must develop and adopt a stronger alternative for the Phase II amendment to incorporate all of the following protections as well as the rest of the Chief's Interim Direction. No further degradation of habitat. No further roadbuilding or even-aged logging. Compensation for Jasper Fire losses. No further degradation of old forest remnants. Tolerance for large-scale disturbances. Treat all guidelines as standards. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 23

Public Concern: The Phase II Draft EIS should contain a "Restoration Alternative."

When preparing the "Phase II" Amendment to the Forest Plan please put the extensive diversity of wildlife and plant species ahead of the livestock and timbering industries. It is time to begin to repair the damage done to this ecosystem over the last century while there is still a small semblance left of what the Black Hills used to be. Please create a "restoration" alternative to emphasize protection and natural reclamation and to guarantee the long-term survival of all native plants and animals, including the aquatic communities. (Individual, Casper, WY – #16)

The amendment must include a "restoration alternative," which emphasizes protecting and restoring more native plants and animals in the Black Hills National Forest (BHNF), and moving the overall conditions of the BHNF to pre-settlement conditions. Further, this restoration should be accomplished using "natural" means, i.e.: prescribed burns and/or reintroduction of extirpated species, NOT logging. Many species have simply disappeared from the Black Hills due to 120 years of a commodity-extraction mentality concerning management of the area. The grizzly bears and gray wolves are gone, as are black bears and most mountain lions. Beaver are far fewer in number than before settlement by Europeans, and the elk herds – once abundant – have been reduced to several smaller remnant herds. We must reverse this trend! (Individual, Woodland Park, CO – #22)

I urge your agency to create a “restoration alternative” that emphasizes protection and natural restoration of all native flora and fauna, including aquatic communities and those dependent on old-growth forest. (Individual, Portland, OR – #31)

We request the USFS include the “Restoration Alternative,” . . . in its entirety into the Phase II Amendment. We also request the USFS label this alternative, “Alternative R” (R for restoration) in all future planning and NEPA documents. (Preservation/Conservation Organization, Boulder, CO – #32)

Given the insignificant contribution of wood fiber to America’s consumption requirements from national forest lands (~2%), the vast economic contribution of non-timber related jobs and income, and the growing body of scientific knowledge recognizing the ecological and economic advantages of non-commercial restoration, the agency has no excuse for not analyzing a non-commercial, restoration only alternative. The no-action alternative is not a no-harvest, restoration only alternative. We request that such an alternative be developed and analyzed in the final EA and that all costs and benefits, both monetary and non-monetary, of such an alternative be disclosed. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 24

Public Concern: The Phase II Draft EIS should use Alternative G, from the 1997 Forest Plan, as the baseline and preferred alternative.

The 1997 Forest Plan appeal decision did not state that Alternative G had to be changed. It only pointed out the procedural flaw in regards to the lack of species viability analysis. During the Phase II process, I ask that Alternative G be the baseline alternative to be evaluated and that Alternative G be considered the preferred alternative unless a more aggressive alternative is developed in regard to forest health. (Wood Products Industry/Association, Hulett, WY – #19)

The Phase II should use Alternative G as a baseline. (Multiple Use/Land Rights Organization, Hulett, WY – #44)

Except for the procedural flaw identified by Deputy Chief Jim Furnish, we support Alternative G, the selected alternative in the Record of Decision for the 1997 Revised Forest Plan. We believe that with the additional species viability studies, Alternative G will be found to meet the intent of the National Forest Management Act. (Crook County Commissioners, Sundance, WY – #57)

PC #: 25

Public Concern: The Phase II Draft EIS should include an alternative based on the Veteran/Boulder Settlement Agreement.

An alternative based on the Veteran/Boulder Settlement Agreement provisions for protection of imperiled wildlife species during ground-disturbing activities, such as logging, was never presented to the wildlife experts that were interviewed. Therefore, the public will never know their views on these mitigation measures, unless such an alternative is included in the Phase II EIS process that includes post-scoping re-interviews. Such an alternative must be evaluated as a benchmark, at a minimum, and would include the following provisions: – No logging and road construction activities on structural stage 4C and 5 stands. – No logging and road construction activities within 1/2 mile of an active or historically active goshawk nest. – No logging and road construction activities within 200 feet of known colonies of seven species of land snails considered to be “species of special concern” in the Black Hills. - Protections of additional large, mature trees essential for maintaining wildlife populations on the Black Hills—from the largest trees available—on each acre that will be logged, such as a prohibition on logging any trees greater than 18” DBH. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 26

Public Concern: The Phase II Draft EIS should disclose the individual environmental impacts for each separable action considered under each alternative.

EPA recognizes the need for actions to improve forest health and to harvest valuable wood products. The DEIS should address and evaluate the environmental impacts associated with separable actions that are considered under each alternative. For example, in the case where multiple tree species are proposed for harvest or other treatments, the DEIS should disclose separately the proposed purpose and environmental impacts associated with harvesting old growth spruce, mature ponderosa pine, and aspen, so that the DEIS reader and decision-makers can interpret how

important each action is to the regional economy, to other uses and users of the Forest, to the environment, and to affected fish and wildlife. The need to disclose separable actions is particularly important for a DEIS reviewer or decision-maker to interpret the environmental impact of a proposed specific project, and EPA will expect that information in project EISs that are tiered to the LRMP. (U.S. Environmental Protection Agency, Denver, CO – #60)

Affected Environment and Environmental Consequences

PC #: 27

Public Concern: The Phase II Draft EIS should address all aspects and variables of Black Hills' biodiversity.

We believe the document should address: – The diversity and uniqueness of flora and fauna that exists in the analysis area. A review of local climatic diversity, topography and ecotones is helpful to identify local biodiversity. – A discussion of nearby, large undisturbed habitats that add to local diversity stability (such as wilderness or roadless areas) is informative. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 28

Public Concern: The Phase II Draft EIS should present an alternative designed to permit natural disturbance regimes and protect their dependent species without degrading aquatic conditions.

The Black Hills NF should carefully examine amendments to the 1997 LRMP that will not jeopardize the viability of species that thrive in naturally disturbed forests, intervene in natural disturbance processes that are vital to ecosystem sustainability, and degrade water quality and watershed condition. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 29

Public Concern: The Phase II Draft EIS should disclose full environmental and economic costs associated with management direction for valuable environmental resources.

EPA supports the Forest Service's efforts to protect and restore valuable environmental resources. We also recognize the relatively high environmental and potential economic values of some of those resources and the costs associated with protecting them. For example, by its definition, old growth and mature trees represent important ecological and economic values. Because of their high demand for use by timber interests, recreation users, preservation and conservation interests, and sensitive and endangered wildlife, the costs associated with preserving mature tree stands are higher than most other Forest natural resources. The risk of catastrophic fire (from an economic and/or environmental perspective) and tree mortality from insect invasion also may be higher in mature and old-growth tree stands. Full disclosure associated with management of those resources should be provided in the LRMP and DEIS. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 30

Public Concern: The Forest Plan Amendment should provide a wide representation of baseline indicators, detailed monitoring strategies, and adjustment protocols to minimize unforeseen adverse effects.

Indicators should be developed for not only fish, wildlife, and vegetative species but also for other resources such as vegetative structure, soils, and recreation amenities, and introduced species such as noxious weeds or alien predators. A management indicator species (MIS) list for the Forest is a first step towards achieving a baseline and working towards management objectives. This MIS list should focus on more than birds and mammals to include also the plant species and other factors that contribute to the success of the LRMP to protect biodiversity and species' viability. To the extent possible, there should be details in the monitoring plan about the types of surveys,

location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in project implementation, and availability of results to interested and affected groups. Feedback should allow the Forest to compare baseline data with monitoring results to adjust standard operating procedures, monitoring intensity, and protocols promptly when adverse effects occur, to ensure that mitigation strategies will improve in the future and that unforeseen adverse effects are identified and minimized. (U.S. Environmental Protection Agency, Denver, CO – #60)

As we have stated in previous correspondence, throughout the years, the Forest Service has been heavy on procedural implementation, commodity output and too light on monitoring and evaluation to substantiate or modify management for multiple uses. Therefore, there must be a strong link developed to connect implementation and monitoring, and to integrate science throughout the entire process. You have the staff and interdisciplinary experts to integrate science. Increased emphasis on monitoring should provide a basis for the Forest Service to adapt to emerging and changing conditions, such as wildland fire. Use of science and redeeming mandates throughout the implementation and monitoring processes should help limit the number of appeals and lawsuits the Forest Service is currently subjected to. The necessity and power of monitoring was substantiated and upheld in the recent US Court of Appeals, 8th Circuit decision in favor of the Forest Service (Central South Dakota Cooperative Grazing District v. Secretary of US Department of Agriculture, et. al., September 2001). If Forest Plans are truly living documents that will guide decisions rather than make them, they can better accommodate, expedite and ameliorate differences that arise among various user groups. Suffice it to say, lack of monitoring, and therefore, lack of defensible data and out-dated AMP's, merit post-fire habitat and resource concerns. At a minimum, lack of monitoring raises public curiosity of how the Agency is validating Forest Plan directions. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 31

Public Concern: The Phase II Draft EIS should disclose reasonably foreseeable direct and indirect environmental effects as well as appropriate mitigation measures.

The Council of Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA state that the environmental consequences section of an EIS should include: indirect effects and their significance (40 CFR 1502.16(b)). Indirect effects are defined as, "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." CEQ regulations also indicate that the EIS should include the means to mitigate adverse environmental effects" (40 CFR 1502.16(h)). This provision applies to indirect effects as well as direct effects. Indirect effects and appropriate mitigation measures should be fully disclosed in the EIS. (U.S. Environmental Protection Agency, Denver, CO – #60)

EFFECTIVENESS OF MITIGATION MEASURES

A comprehensive discussion of proposed mitigation for direct, indirect and cumulative impacts is required by the CEQ Regulations for Implementing the Procedural Provisions of NEPA. The CEQ regulations state that an EIS should include the means to mitigate adverse environmental effects (40 CFR 1508.7). Judicial reviews of NEPA cases have supported not only the need for identifying mitigation measures, but for discussing mitigation effectiveness as well. Mitigation effectiveness is determined by using monitoring that is designed to compare baseline data with existing conditions. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 32

Public Concern: The Phase II Draft EIS should provide contingency plans to counteract unexpected and unwanted ecological consequences.

A typical environmental concern is the impact of several small, discrete forest management projects (e.g., timber harvest, vegetative management, prescribed burns, road construction/transportation management, disease management). Each management project may cause significant impacts individually and have EISs completed for them, but the aggregate impacts can have highly significant ecological consequences. Clearly, the Forest Service's objectives for social and economic support, forest health, and biological diversity require tradeoffs to be made when management projects are implemented. The Forest Service already recognizes the need for comprehensive understanding of the tradeoffs to be developed in the LRMP and the need for individual projects to support the LRMP's goals and objectives. EPA encourages a monitoring plan and contingent management and adaptive

approaches that allow response to natural disasters, unexpected consequences of management activities, and other external factors. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 33

Public Concern: The Black Hills National Forest should closely assess the impact of environment-disturbing activities and restrict those activities from sensitive areas.

A serious and honest assessment of the impact of logging, mining, grazing and tourism on all types of ecosystems in the area should be done—not skewed in any direction. Then those activities should be barred absolutely from the most sensitive areas, and where permitted should be controlled strictly to ensure that they do the least damage possible (including road building). (Individual, Laramie, WY – #10)

Seriously and honestly assess the impacts of logging, road building, livestock grazing, mining, and off-road vehicle use on wildlife, plants and their habitat. Previous assessments have been disingenuous. (Individual, Portland, OR – #31)

ASSESS CUMULATIVE IMPACTS

A century ago, the impacts of one timber sale may have been minor, but the impacts of a century on nonstop timber harvest has been significant. When analyzing the impacts of logging, grazing, road building, mining and off-road vehicle use, the Forest Service needs to fully analyze and assess the cumulative impacts of these activities with regards to the past, present and reasonably foreseeable future. The Phase II Amendment should contain a serious and honest assessment of the cumulative impacts of these activities. Management direction should restrict these activities. Management direction should restrict these activities in order to adequately minimize cumulative impacts and aid in restoring the Black Hills ecosystem. (Individual, Portland, OR – #31)

PC #: 34

Public Concern: The Phase II Draft EIS should address projects on adjacent lands within the cumulative impacts analysis.

NEPA requires that cumulative impacts be addressed as a summary of the individual impacts of this and all other “reasonably foreseeable” projects, including activities on private, adjacent land irrespective of what agency or entity has decision-making authority or analysis responsibility. The cumulative, site-specific effects of these projects on the analysis area’s critical environmental receptors must be analyzed and disclosed. Connected actions which result in increased cumulative effects are of concern to the EPA. A common inadequacy of documents is the lack of analysis or disclosure of the sum of individual effects of all projects on the local environment’s critical environmental receptors. A summary listing of other projects occurring in the vicinity without the accompanying analysis is insufficient. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 35

Public Concern: The Phase II Draft EIS should address the importance of plant and animal interrelationships to long-term environmental sustainability.

We understand that you are developing for your recently revised forest management plan an amendment that could (must) seriously address the long-range future success of native plant and animal species. Even more important, you must address the long-range success of their interrelationships. Your forest mosaics, for example, should not be limited to 2nd, 3rd and 4th growths. None of us are perfect sustainable-users, but sustainability is a worthy goal. . . . Protection of individual species may be pointless without protection of their interrelationships. Current members of Homo sapiens are not demonstrably superior to their counterparts of the relatively recent past, but our acknowledgement of the cause/effect relationship in over-use/extinction is a valuable contemporary concept. Because of that, we—you—are not excused from the responsibility of retaining or restoring intact natural ecosystems, and by so doing, avoiding extinctions beyond the “normal” rate. You must look to the future, not of two or three industries hurting from national and global competition, but the vast majority of our own species as well as of other species. (Individual, Bondurant, WY – #58)

PC #: 36

Public Concern: The Black Hills National Forest should manage environmental resources to ensure protection of a viable ecosystem.

The Black Hills have suffered much exploitation over the years. What was once a rich and unique place in the Great Plains area has become little more than a large logging operation. It is time to balance the scales and give the natural ecosystem a place at the table. The Black Hills are a special place, rising out of the Great Plains as a forest oasis. Please start managing the area in order to ensure its survival as a viable ecosystem. (Individual, Davis, CA – #9)

I would say that it's time to completely re-think the emphasis for the BHNF. We need to move away from the utilitarian philosophy that has driven the commodity-extraction (i.e.: logging) mentality that has marked the first 120 or so years in the Black Hills. It's time for a new paradigm, that of restoration and protection of native plants and animals. We owe it to posterity to manage the Black Hills National Forest with its long-term ecological health in mind. (Individual, Woodland Park, CO – #22)

MANAGE FOR LONG-TERM INTERESTS

I am very worried that with the present administration in Washington, commercial interests will have the loudest voice in the future of one of the loveliest and most fragile areas in the central plains. Careless grazing, virtually unregulated mining and logging (with the attendant roads which cut great swaths all over the area) and the fouling of streams caused by all three activities when improperly controlled and monitored, have already done terrible damage. Federal lands should be managed for the long-term good of all types of users, not just short-term profits for a very few. The people who want to engage in mining and logging and grazing don't care what happens as long as they get their profits in the short term, but what they do can destroy a wonderful heritage which really belongs to all of us. (Individual, Laramie, WY – #10)

Given the relatively small area the Hills covers, it is especially susceptible to overuse and irreversible harm. As an ecosystem is will not be able to recover from too many damaging man-made events. I encourage you to look with this new view in mind, to enforce and encourage the long-term natural values – wildlife, rare plants, unique natural areas, and clean healthy streams – rather than short-term economic gain. The plan must ensure the long-term survival of native animals and plants, not just focus on the timber industry and its outcomes. The Black Hills region is likely at a critical juncture; the area can be preserved as the natural beauty it is, or it can go past the point with human demands which damage more than protect, to a place which cannot recover its natural wonder. (Individual, Cheyenne, WY – #43)

PC #: 37

Public Concern: The Black Hills National Forest should emphasize restoration in managing forest resources.

The BHNF is still suffering from years of misguided management that has essentially transformed much of the forest into a tree farm, providing for only commodities related to timber harvesting with no consideration to other, equally valuable natural resources. Years of logging, roadbuilding, mining and livestock grazing have left the forest ecosystem in an incredibly imperiled condition, leaving restoration as the only alternative for ensuring ecological health. We hope the USFS realizes the critical nature of the Phase II Amendment in that, if management direction provided by the Amendment fails to fully protect wildlife and plant species and their habitat on the BHNF, there is a high possibility that many species may be extirpated from the forest. The USFS should recognize not only its legal responsibility, but its ethical responsibility as land managers and stewards of healthy ecosystems. . . . We hope the USFS realizes the importance of every wheel and cog in the BHNF and the need to restore what has been discarded and destroyed through past ignorance. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 38

Public Concern: The Black Hills National Forest should develop a Restoration Alternative in order to establish a Black Hills ecosystem education program.

The "Restoration Alternative" should ensure: Establishment of an educational program that teaches forest users and the general public about the Black Hills forest ecosystem and the natural processes that shape this forest. Due to a severe lack of communication, the Forest Service has essentially fostered an atmosphere of indifference and open hostility toward protection of the natural values of the Black Hills. This has resulted in the neglect of Congressionally recognized values of National Forest lands, primarily those values related to wildlife, plants, habitat

and wildlands protection. This neglect needs to be corrected by the Forest Service. Primarily, the Forest Service needs to convey to the public the values and importance of less charismatic wildlife and plant species such as woodpeckers, snails and rare ferns. (Preservation/Conservation Organization, Boulder, CO – #32)

Physical Elements

PC #: 39

Public Concern: The Black Hills National Forest should address post-fire environmental effects to cave resources.

J-RAT states that loss of vegetation near caves “will also change airflow patterns around the cave mouth, affecting temperature and humidity of the cave microclimate. This could reduce the caves’ suitability for use as maternity and hibernation roosts.” What are the post-fire protection plans for cave visibility and vulnerability of bats to human and predator disturbances as well as protection of natural revegetation around cave openings? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 40

Public Concern: The Black Hills National Forest should assess soil resources and consider a soil management plan.

Protection of basic soil, water and cave resources. How does the Forest Service plan to stabilize, protect and enhance organic ground cover, maintain slope stability to prevent further harmful surface water runoff and yet sustain proper livestock management? Has the Forest Service identified soil/landtype associations within all fire boundaries where livestock may impact distressed soils or impaired systems? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 41

Public Concern: The Black Hills National Forest should monitor and mitigate post-fire impacts to soil resources.

Although J-RAT stated that the BAER team did not find an emergency in the potential loss of soil productivity, it did indicate that soil cover was affected. A recommendation was made to “retain the productivity of burned sites before ground-disturbing activities resume. . . . Examples of such disturbances include cattle grazing and trampling before a litter layer has developed and motorized traffic due to increased accessibility. . . . It will likely take at least three years to return the moderately and intensively burned areas to pre-fire erosional conditions.” Soil loss can result in a very shallow soil mantle and rocky environment with low plant productivity and vigor. Significant rain events the summer of 2001 resulted in movement of major amounts and variable sizes of material in Jasper canyon lands. Hydrological functions and soil monitoring results could be used to adjust management activities and develop mitigation where necessary to prevent significant impairment of long-term soil productivity. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 42

Public Concern: The Phase II Draft EIS should provide baseline water quality and aquatic habitat data to help define and recognize project impacts.

The EPA considers the collection of baseline water quality data at the project level important to provide a comparison with projected impacts as well as actual project impacts. In addition to inventory data and the existence of known point or non-point pollution sources, other relevant information includes aquatic species habitat and the condition and productivity of that habitat. (U.S. Environmental Protection Agency, Denver, CO – #60)

REFLECT STATE’S WATER QUALITY ASSESSMENT

Road construction, timber harvest, prescribed burns, and other ground disturbances and management practices generally may cause erosion and sedimentation. The appropriate best management practices (BMPs) to reduce potential non-point sources of pollution can be designed into alternatives under consideration and disclosed. Existing water quality conditions in NEPA documents should reflect the State’s water quality assessment. Direct or indirect

non-point source water-quality effects should be reduced through planning and mitigation measures. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 43

Public Concern: The Phase II Draft EIS should establish protocols for protection of riparian areas, water quality, and water yield.

Riparian area protection, water quality and water yield is not adequately addressed in the Revised Plan. The BHNF has lost several hundred miles of streams. Many streams that still exist are in poor condition due to loss of streamside vegetation and diversity, loss of beaver, bank trampling and low flows. Some forest uses that impact riparian areas include livestock grazing, timber prescriptions, road crossings and cumulative effects from adjacent landowners. The Plan Amendment EIS needs to analyze water resources. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 44

Public Concern: The Phase II Draft EIS should list the designated uses of and possible impacts to any affected waters.

State WQS establish designated uses for a water body (or water body segment), support the uses with numeric or narrative water quality criteria, and protect the uses with an anti-degradation standard. The EIS should list the designated uses of any affected waters, and it should fully disclose all water quality impacts on these waters. (U.S. Environmental Protection Agency, Denver, CO – #60)

DESCRIBE EFFECT OF MANAGEMENT ACTIONS BY ALTERNATIVE

The EIS should describe the relationship between surface water quality and biota found in affected waters. The EIS should describe the effect of each alternative on designated uses for area surface waters with attention to fisheries spawning and rearing habitat. Water quality parameters, if any, that are limiting factors to local fisheries should be identified under each alternative. Management practices, including road construction, should be evaluated to identify the extent to which fish habitat could be impaired, including effects on stream structure, seasonal and spawning habitats, large organic material supplies, and riparian habitats. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 45

Public Concern: The Black Hills National Forest should clarify the pre- and post-fire management plans for seeps, springs, and stream reaches.

The hydrological assessment indicated certain stream reaches in the Limestone Allotment were in non-compliance and did not meet Forest Plan objectives. Elsewhere in the EA, seeps and springs were in need of protection (Mitigation for seeps and springs Custer EA MIT C 317). Were pre-fire mitigative measures taken for these stream reaches, seeps and springs and how does the Forest Service propose to ensure post-fire environmental compliance? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 46

Public Concern: The Black Hills National Forest should explore all ways to minimize impacts to wetland and aquatic resources.

Executive Order 11990 requires Federal agencies to protect wetlands. The EIS will describe the existing wetlands in the analysis area; their acreage, type, and ecological role; and how both acreage and function will be protected. Road construction and vegetation clearing, timber harvest, and other disturbances may result in hydrologic impacts. At some critical level of these activities, changes to surface and subsurface drainage patterns can ultimately lead to changes in wetland integrity and function. To assure consistency with the CWA 404(b)(1) Guidelines, a thorough analysis of all possible alternatives to avoid and minimize wetland and aquatic resource habitat impacts should be addressed through the NEPA process. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 47

Public Concern: The Black Hills National Forest should strive to avoid impacts to wetland areas from non-water dependent activities.

Planning and design should seek to avoid impacts wherever possible, to minimize impacts which are unavoidable, and, as a final alternative, to provide adequate compensation for all unavoidable impacts [40 CFR 230.10(a)]. A thorough evaluation of less environmentally damaging project alternatives is necessary. For non-water dependent activities, such as roads, alternatives to siting in wetlands are presumed to be available unless demonstrated otherwise. Avoidance is required before compensatory mitigation will be considered. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 48

Public Concern: The Phase II Draft EIS should provide a comprehensive mitigation plan to resolve any possible impacts to wetland resources.

The document must provide a clear description of anticipated direct, indirect and cumulative adverse impacts to wetlands from all planned activities. In accordance with the CWA, wetland mitigation strategies, methods and programs should be disclosed in the assessment and included in the overall site mitigation plan. We recommend that a detailed compensatory mitigation plan be developed for unavoidable wetland and aquatic resource impacts, if any impacts remain after avoidance is exhausted as an alternative. It should contain a statement of goals, a monitoring plan, long-term management/protection objectives and a contingency plan (a commitment to conduct additional work if required to meet the goals of the plan). The mitigation plan should also include BMPs and mitigation measures that will manage stormwater runoff from roadways before it reaches wetlands, streams and other aquatic habitats. In general, wetlands, including mitigation wetlands, should not be used to treat stormwater. (U.S. Environmental Protection Agency, Denver, CO – #60)

DESIGN OF MONITORING PLAN

The proposed monitoring program to be used for determining effects on water quality and the aquatic environment is to be disclosed in the assessment. The design of this program should: 1) ensure State water quality objectives are met, 2) provide a way to initiate additional measures if needed to meet State WQS and goals, 3) evaluate the effectiveness of the BMPs used in a project, 4) evaluate the accuracy of estimates made in the analysis, and 5) provide a feedback mechanism for future projects. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 49

Public Concern: The Phase II Draft EIS should assess and analyze possible impacts to Sand Creek from Black Hills management activities.

While we are not expecting major impacts from changes in the forest plan to directly impact Sand Creek, this issue should also be considered along with the issues already identified. Changes in timber harvest and/or grazing in the drainage could impact long-term flows and/or sediment in lower Sand Creek. (Wyoming Department of Fish and Game, Cheyenne, WY – #55)

Biological Elements

Vegetation

PC #: 50

Public Concern: The Forest Plan Amendment should protect the major vegetative complexes found within the Black Hills National Forest.

The Black Hills have long been known as a botanical crossroads, with elements of vegetation from four of the major biomes, or vegetative complexes, that occur in North America: Rocky Mountain coniferous forest; northern Great Plains grassland; eastern deciduous forest; northern coniferous, or boreal, forest. This fact makes the Black Hills absolutely unique, and it's imperative that the management plan reflects a concern to protect the various components of this diverse forest! (Individual, Woodland Park, CO – #22)

PC #: 51

Public Concern: The Phase II Draft EIS should analyze potentially significant impacts to a variety of plant species.

The Phase II Amendment should include an assessment and analysis of the potentially significant impacts on the following species: All sensitive plant species, Lodgepole Pine, Limber Pine, American Elm, Moschatel Muskroot, One-flowered Wintergreen, Downy Gentian, Helleborine, Christmas Fern. (Individual, Berkeley, CA – #23)

PC #: 52

Public Concern: The Black Hills National Forest should safeguard forest resources without relying on the timber industry to act to preserve indigenous species.

Timber industry interests will not have an interest in the long term survival of the Black Hills and its indigenous species; it is up to you to protect all of the areas currently free of roadways. (Individual, Longmont, CO – #29)

PC #: 53

Public Concern: The Forest Plan Amendment should establish standards that ensure a net increase in hardwood restoration.

Hardwood and shrub regeneration, expansion, priority, protection and utilization methods and objectives were not adequately addressed in the Revised Plan and Phase I. BMP's for oak need to be defined. With increased acreage of hardwoods and more healthy shrub communities, enhancement of biodiversity and wildlife habitat would increase. Objective 201 to conserve existing hardwood communities and restore historic hardwood communities by 10% over 1995 conditions is inadequate to ensure a net increase. Hardwood management and restoration should be a standard that is actively and aggressively pursued. Phase I Amendment EA, Chapter 3, page 49 states: "To improve biological diversity, hardwoods, shrubs and meadows would all continue to increase under all alternatives." Other than the unplanned fires of 2000-2001 benefiting these three landscape components, we are suspect that hardwoods and shrubs will increase under current Plan direction of an unenforceable objective. Game, Fish and Parks has a response from the FS dated August 21, 1969, that hardwood acres on the BHNF totaled 63,100 acres. In the Plan Revision EIS, BHNF reported 63,271 acres. This could hardly be considered an increase and we question that without a significant Plan Amendment, current management practices alone will not achieve an increase. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 54

Public Concern: The Forest Plan Amendment should restrict primary activities that lead to the decline of hardwood stands.

While we commend the USFS for addressing the need to increase the amount of hardwoods on the forest through the 1997 Forest Plan, we are deeply concerned about the methods used to achieve the arbitrary goal of 10% as stated in the 1997 Plan. Rather than restrict the primary activities leading to declines in hardwood stands, the USFS has instead utilized timber harvest as the only tool to aid in hardwood retention and restoration. Activities such as grazing, fire suppression and prevention, and water developments are the primary activities leading to declines in hardwood stands and these activities must be restricted accordingly to ensure natural hardwood restoration. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 55

Public Concern: The Forest Plan Amendment should identify a hardwood restoration goal based on the needs of hardwood-dependent wildlife species.

The USFS should determine an appropriate hardwood restoration goal backed with extensive analysis and assessment of historical hardwood conditions and needs of hardwood-dependent species of wildlife. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 56

Public Concern: The Forest Plan Amendment should prioritize hardwood restoration in areas where hardwood-dependent species are declining or nonexistent.

Hardwood restoration should be top priority in areas where populations of hardwood-dependent species of wildlife are declining or where they are currently nonexistent due to habitat degradation. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 57

Public Concern: The Forest Plan Amendment should restrict post-fire livestock grazing.

Research has shown that some graminoid species (*Agropyron smithii*, *Stipa comata*, *Carex filifolia*) may not recover to pre-burn levels until three years post-burn in less productive sites (Wright 1978; Whisenant and Uresk 1989). Fire-associated reductions in vegetation also have been shown to result in increased erosion rates that usually remain higher until sufficient revegetation occurs (Marston 1952; Helvey et al. 1985). In aspen stands, research has shown that ground cover (rocks, plants, and litter) equaling 65 percent or more is needed to adequately control overland runoff and erosion in the mountainous west (DeByle and Winokur, eds. 1985). Therefore, reintroducing cattle before the vegetation is sufficiently recovered is likely to result in heavier than normal grazing pressure in “green” areas and possibly result in increased erosion along travel routes and other cattle use areas, especially those within more poorly revegetated areas. (U.S. Fish and Wildlife Service, Pierre, SD – #59)

We were told that cattle were deferred for two years in Cicero due to manual seeding efforts and to allow for seeds to take hold. If manual-seeding efforts needed to be protected in Cicero, will not seeds from natural sources take longer to become established and out-compete alien plant species such as Canada thistle within Jasper and other fires? We have repeatedly been told that livestock grazing is deferred one year prior to and two years after a prescribed burn. The post-prescription deferment is to allow vegetation, soils and other impacted resources a minimum of two years to recover. Some areas within the recent fires mimic prescriptive burns. Regarding pre-fire grazing conditions as mentioned in BAER, how does the Forest Service propose to ensure post-fire utilization standards are being met? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 58

Public Concern: The Black Hills National Forest should carefully evaluate grazing in burned areas to ensure that it will improve conditions of the range and forest.

The federal regulations we researched are quite clear regarding monitoring, range and forest health, range management, biodiversity and resource protection. We ask if the Districts, together with other Forest experts, are going to formulate a post-fire grazing proposal that meets Forest Plan direction, truly represents meaningful, multiple-use management and performs actions in the best interest of our natural resources and not per some arbitrary prescription. The Black Hills National Forest is on record as favoring fire restoration statements in J-RAT and we look to you to follow through with your obligations for post-fire rehabilitation and redeem J-RAT statements. Wildfires leave a lasting impression on the land. If the Black Hills National Forest Land and Resource Management Plan is truly a living document, it should withstand flux and adjust to changing conditions, such as wildfire. The Forest Plan direction for rangeland management includes goals, objectives, standards, guidelines and the identification of lands suitable for and capable of livestock grazing. The Forest Plan also describes standards and guidelines for management of livestock to ensure that livestock grazing is compatible with, or promotes the attainment of desired conditions for physical and biological resources. A systematic, interdisciplinary approach (16 U.S.C. section 1604(b)), including wildlife, timber, soils, hydrology and plant ecology, will achieve integrated consideration of physical, biological, economic and other Forest Plan goals. Only then can the Black Hills National Forest confidently answer to the public that livestock grazing within fire perimeters will improve current conditions of the range and forest. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 59

Public Concern: The Black Hills National Forest should monitor post-fire sensitive species recovery.

Have areas of known sensitive species occurrence been monitored post-fire to determine if these species recovered to a physiological level to withstand livestock grazing in addition to natural stresses such as drought, competition and wild ungulate grazing? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 60

Public Concern: The Forest Plan Amendment should promote aspen regeneration.

The Service is concerned with successful regeneration of aspen stands and shrubs within post-fire areas. Aspen forests are islands of high biodiversity within the more prevalent coniferous forests throughout the West (Rumble et al. 2001; White et al. 1998). In the Black Hills, invertebrate abundance and bird diversity are higher in aspen than in surrounding ponderosa pine forests (Rumble et al. 2001). . . . Aspen also has been shown to be important for game species, including ruffed grouse, white-tailed deer, mule deer, and elk (Loft et al. 1991; Rumble et al. 1996; Hull Sieg and Severson 1996). . . . Aspen forests are excellent natural firebreaks and allow for properly functioning hydrological systems which help reduce the spread of wildfires within the more flammable coniferous forests of the Black Hills (DeByle and Winokur, eds. 1985). (U.S. Fish and Wildlife Service, Pierre, SD – #59)

We question why current aspen management direction does not include restoring the 5,385 acres that were eradicated by chemical spray or bulldozed and planted to ponderosa pine between 1956 and 1966. The acres of aspen-pine and aspen-spruce mix that have succeeded to pine-aspen and spruce-aspen mix or worse the past 100 years continues at a pace faster than accomplishing Objective 201. From our understanding, BHNF hardwood inventory system does not accurately measure hardwood acreage. If our understanding is correct, by including basal area of renegade, invasive ponderosa pine, an historical aspen stand, for example, could be type-converted to ponderosa. If this is, in fact correct, there simply will not be a true, net 10% increase of aspen over 1995 conditions when true aspen clones are incorrectly typed. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

LIMIT POST-FIRE GRAZING

It has historically been known that heavy trampling and defecation by livestock during the initial stages of sucker growth may set back aspen regeneration by two to four years (Sampson 1919). It is well documented that both domestic cattle and wild ungulates (elk and deer) heavily browse/graze/trample regenerating aspen, often to the detriment of the entire stand (Loft et al. 1987; Rumble et al. 1996; Hull Sieg and Severson 1996; White et al. 1998; and others). This type of heavy use will reduce the ability of aspen to regenerate after burning and may even kill entire clones (White et al. 1998; Kay and Bartos 2000). Introducing cattle into aspen clones already impacted by wild ungulate browsing can only increase damage and perpetuate stress to regenerating aspen (Kay and Bartos 2000). The Service believes it is imperative for forest and range health and biodiversity to keep livestock out of post-fire areas until aspen is no longer susceptible to heavy damage by livestock. (U.S. Fish and Wildlife Service, Pierre, SD – #59)

The ability of aspen stands to regenerate after fires, such as Jasper, is greatest within the first few years after burning. Measures should be included in the Phase II Amendment to ensure Forest Plan goals, such as increasing aspen ten percent over the life of the plan, can be attained. This may require the reduction or elimination of grazing for four to five years in burned areas to ensure that aspen regeneration occurs (Tew 1981). This time frame is based on the average number of years aspen suckers require to reach a minimum height of 1.5 meters (5 feet), at which time terminal leaders are out of the reach of cattle (DeByle and Winokur, eds. 1985). (U.S. Fish and Wildlife Service, Pierre, SC – #59)

PC #: 61

Public Concern: The Black Hills National Forest should manage for optimum successional stages in timber structure.

The 1983 Forest Plan (EIS IV-23) expressed optimum successional stages for wildlife species richness at 17%, 21%, 20%, 21%, and 21% in structural stages 1 through 5, respectively. What happened to this management concept with the Revised Plan? An improved balance of structural stages could assure a sustained yield of timber, although it's

well recognized that under the present structural stage classification, the local timber industry only wants stages 3 and 4. BHNF and forest products research should continue to look into alternative uses for POL. Our concern is further expressed with the identification and conservation of the “best” or “better” stands available. At times it has been our experience that the best old growth stands are thinned first and then designated as future old growth. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 62

Public Concern: The Black Hills National Forest should increase retention of snags and seed trees.

Stronger snag protections are needed. The Revised Plan direction to leave a few additional seed trees in a shelterwood cut is unlikely to meet Forest Plan snag requirements over time, and certainly inadequate to meet actual wildlife needs of snag-dependent species. Under a natural majority regime, the Forest Service would have to leave roughly five times as many seed trees (closer to 50-60 leave trees per acre rather than 11-15) to provide the Plan’s minimal snag requirements. Even higher amounts of leave trees would be needed to meet the Chief’s interim direction, calling into question the appropriateness of even-aged logging at all. Given the increased exposure of snags in seed cuts and overstory removals to windthrow, these snags are unlikely to stand as long as the recruitment assumptions suggest, again calling into question current logging prescriptions on the BHNF. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 63

Public Concern: The Forest Plan Amendment should recruit snags from green trees.

To maintain viable, well-distributed populations of snag-dependent species such as the pygmy nuthatch, the Phase II direction must provide for recruitment of large snags by preserving large green trees. . . . Recruitment is important in the Black Hills because many snags left in logged areas are either blown down or cut down by fire wood gatherers. The Chief’s interim direction does not provide for snag recruitment from live trees. (Preservation/Conservation Organization, Rapid City, SD – #8)

PROHIBIT LOGGING LARGE TREES

Given the shortage of large snags (important for the pygmy nuthatch and saw whet owl), the Phase II amendment must prohibit the logging of all live trees larger than 18 inches DBH so these trees can eventually become large snags. (Preservation/Conservation Organization, Rapid City, SD – #8)

PRESCRIBE NATURAL RECRUITMENT

Where snag densities or downed woody debris requirements are not being met, the USFS should ensure the BHNF meets these requirements as soon as possible through natural processes, not vegetative manipulation (e.g. logging, thinning, injecting trees with fungi, etc.). (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 64

Public Concern: The Black Hills National Forest should base snag retention standards on current, site-specific research.

The snag retention issue needs to be fully explored. . . . Snag retention recommendations should not be based upon the research prior to forest conditions in 1997. This was a narrow research project of 10 snags. Burdening the entire national forest on those results is absurd. . . . Using information that is not based upon what is actually happening in the Black Hills is inappropriate. (Wood Products Industry/Association, Hulett, WY – #19)

PC #: 65

Public Concern: The Forest Plan Amendment should revise snag retention guidelines based on accelerating rates of snag recruitment.

The fires and insect epidemic have created a huge number of snags of all sizes. The requirements for snags should be driven by the actual fall rate of trees in the Black Hills National Forest. . . . Due to fires and insect problems, the recruitment of new snags has been on the rise. (Wood Products Industry/Association, Hulett, WY – #19)

PC #: 66

Public Concern: The Forest Plan Amendment should revise snag density and downed woody debris goals based on analysis of wildlife requirements for downed woody debris and hard and soft snags.

The Chief noted through his Appeal Decision that the 1997 Forest Plan lacks adequate analysis to support any forest-wide snag density or downed woody debris goals. Additionally, the snag densities and downed woody debris requirements in the Phase I Amendment are not supported with any BHNF-specific monitoring data or BHNF wildlife species needs. The Phase II Amendment should therefore conduct a thorough analysis and assessment of wildlife needs in relation to quality and quantity of snags – both hard and soft – and quality and quantity of downed woody debris for the BHNF. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 67

Public Concern: The Forest Plan Amendment should prescribe natural recruitment of snags.

Where snag densities or downed woody debris requirements are not being met, the USFS should ensure the BHNF meets these requirements as soon as possible through natural processes, not vegetative manipulation (e.g. logging, thinning, injecting trees with fungi, etc.). (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 68

Public Concern: The Forest Plan Amendment should provide direction for road and trail closures where snags present a public safety hazard.

The USFS should provide specific direction for snags that may pose a public safety hazard. Rather than blindly cutting down snags that pose perceived threats, the USFS should instead reduce potential snag hazards by closing roads or trails in order to reduce the possibility of a forest user being injured. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 69

Public Concern: The Forest Plan Amendment should prohibit cutting snag hazards utilized by cavity nesting, threatened, endangered, or sensitive species.

If it is determined that roads or trails are essential and cannot be closed at any cost (e.g. major highways, routes to homes, etc.), then the USFS should conduct a thorough survey of snag hazards to ensure no cavity nesting species are utilizing hazard snags and that threatened, endangered, or sensitive species are not utilizing snag hazards (e.g. as foraging roosts, winter roosts, foraging for insects, etc.). If cavity nesting species or threatened, endangered, or sensitive species are utilizing snags or snag densities will be reduced below required levels, the USFS should not cut snag hazards. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 70

Public Concern: The Forest Plan Amendment should protect old growth forest.

Old growth forest should remain uncut – it is here that the forest retains its most natural characteristics. (Individual, Davis, CA – #9)

Protect all remaining old forests, including those stands in areas smaller than 1,000 acres. (Individual, Boulder, CO – #53)

The Forest Service should ensure that all white spruce is protected from logging and fragmentation and at least 20% of the ponderosa pine forested landscape exists in an old growth condition, as experts have recommended. (Individual, Portland, OR – #31)

The goal of the Phase II Amendment should be to significantly increase the quantity and quality of old growth forest habitat on the BHNF through protection of all current old growth (i.e. stands that are currently in late succession stages) and recruitment of potential old growth. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 71

Public Concern: The Black Hills National Forest should meet Forest Plan objectives for old growth forest protection.

The Revised Plan only identifies 2% of the forest as being in old growth condition and unfortunately, this 2% now includes Wilderness which effectively reduces actual late successional acreages compared to the 1983 Plan. The 1983 Plan stated, as a standard/guideline, that 5% of a forested area should be in old growth (this did not include Wilderness and other areas such as unsuitable lands, botanical areas, etc.). However, the Revised Plan Objective 207 (now not a standard or guideline and therefore, not directly enforceable) is to manage for at least 5% of the forested land base in late succession. For over 20 years BHNF has not met either the 1983 nor the 1997 Plan directions. This is in direct conflict with species viability and diversity and to provide a balance of structural stages across the landscape. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 72

Public Concern: The Black Hills National Forest should not use old growth management as an excuse to log.

We support the [Forest Plan] provision that late successional stands (outside of Wilderness) be managed to maintain, improve and enhance old growth characteristics for biological trust resources. However, timber, salvage and fuels management prescriptions should be tools to achieve those goals and should be implemented with discretion and with wildlife biologists' and ecologists' recommendations and not as a guise simply to meet ASQ's. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 73

Public Concern: The Forest Plan Amendment should increase the portion of the planning area managed for old growth habitat.

For species like the Northern goshawk, three-toed woodpecker, black-backed woodpecker, Lewis's woodpecker and American marten, old growth forest habitat – both white spruce and/or ponderosa pine – is essential for survival. Unfortunately, the Black Hills National Forest lacks a substantial old growth forest component, significantly impairing the viability and distribution of old growth dependent species. Although the USFS has allocated 5% of the BHNF as old growth, this number does not reflect the actual amount of old growth on the forest nor the suitability of the allocated old growth as specific wildlife habitat. . . . When considering all factors that currently limit or could potentially impair current old growth allocations and the habitat provided (e.g. inadequate canopy cover, fires, steep slopes, aspect of slopes, proximity to roads or homes, recreational impacts, etc.), the amount of actual old growth that provides optimum habitat is nearly nonexistent. (Preservation/Conservation Organization, Boulder, CO – #32)

The Phase II direction should not allow any logging of old growth (i.e., Structural Stage 5) or dense mature forest habitat (Structural Stage 4C) in the Black Hills; there is too little of this habitat left to allow any of the remaining SS-4C and SS05 habitat to be logged or fragmented by roads. To ensure viability of goshawks, interior forest song birds, martens, and other forest-dwelling species on the Black Hills, the Phase II amendment must include direction to prevent any further logging (regardless of method) or burning of old growth (Structural Stage 5) or "mature dense" forest (SS-4C) habitat (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 74

Public Concern: The Forest Plan Amendment should ensure recruitment of old growth forest.

While 20% of the forest does not currently exist in an old growth condition, the Phase II Amendment should ensure this amount is attained as soon as possible. All existing stands of old growth should be fully protected from logging, thinning and road building and a large number of recruitment stands of old growth, primarily ponderosa pine, should be fully protected as well. Recruitment stands of old growth should be well-distributed across the forest and should be abundant enough so that the viability of these stands will be maintained even if natural disturbances such as fire, windthrow and insect mortality disturb the natural succession of stands. Additionally, natural processes should be allowed to run their course undisturbed within these stands. (Individual, Portland, OR – #31)

The USFS should ensure that all white spruce is protected from logging and fragmentation (i.e. dividing habitat through management activities such as roadbuilding). And, given that weather conditions on the BHNF are more

extreme than those forests in the Southwest where the Southwest Goshawk Guidelines apply, greater than 20% of the ponderosa pine forested landscape should be in an old growth condition (i.e. VSS 6 as described on page 4 of the Phase I Goshawk Analysis), as experts have recommended. This is to ensure that wildlife have adequate protection from harsh elements (e.g. thermal cover, nesting habitat, etc.) and that, in the advent of natural wildfires or insect outbreaks, a significant amount of old growth remains throughout the BHNF. (Preservation/Conservation Organization, Boulder, CO – #32)

BASED ON SPECIES-SPECIFIC HABITAT REQUIREMENTS

Old growth protection and recruitment through the Phase II Amendment should be determined by the needs of all the wildlife dependent on this habitat. . . . The amount of younger trees recruited as old growth should be dependent on the need to provide large blocks of old growth greater than 1,000 acres for woodpeckers, northern flying squirrel and other old-growth dependent species, the need to provide a minimum of 20% of old growth ponderosa pine (VSS 6) forest across the landscape for northern goshawk, and the need to provide unfragmented old growth habitat for species such as the American marten. (Preservation/Conservation Organization, Boulder, CO – #32)

Old growth retention and recruitment should be based on the need to provide high quality ponderosa pine nesting, fledging and foraging habitat for known and potential (i.e. unknown) Northern goshawk territories across the forest, large blocks of white spruce and ponderosa pine old growth habitat (at least 1,000 acres in size) for woodpecker species and unfragmented old growth ponderosa pine and white spruce habitat for American marten. These figures have been recommended by experts and can be found in the Expert Interview Summary. For other old growth dependent species, the USFS cannot simply assume that measures taken to protect old growth for goshawk, woodpecker species, or the marten will adequately protect these other species. The Phase II Amendment should provide, in enough detail and with up-to-date and consistent data, analysis of old growth needs for other species and provide species-specific management direction for these species. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 75

Public Concern: The Phase II Draft EIS should include a Restoration Alternative to protect and recruit old growth forest.

Within this Restoration Alternative, to sum up, I implore your agency to . . . protect existing old growth forest and allow a greater amount of younger forest to reach old growth stature. (Individual, Portland, OR – #31)

The “Restoration Alternative” should ensure full protection of all existing old growth forest habitat from logging, road building and off-road vehicle use and allowing a large amount of younger trees to reach old growth conditions. The amount of younger trees recruited as old growth should be dependent on the need to provide large blocks of old growth greater than 1,000 acres for woodpeckers, northern flying squirrel and other old-growth dependent species, the need to provide a minimum of 20% of old growth ponderosa pine (VSS 6) forest across the landscape for northern goshawk, and the need to provide unfragmented old growth habitat for species such as the American marten. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 76

Public Concern: The Phase II Amendment should protect rare and sensitive plant species from livestock grazing and off-road vehicle use.

My family and I have visited the Black Hills National Forest many times because we feel it is a most special area. During our hiking, camping and birding trips we have been appalled to see the damage caused by overgrazing of cattle. Since plants are of particular interest to us it is truly dismaying to see that the Forest Service has made no effort to protect plants, wildflowers and grasslands from cattle grazing. (Individual, Big Pine Key, FL – #37)

The Phase II amendment must include direction to halt impacts to sensitive species of plants and rare plant communities in the Black Hills from livestock grazing and other activities. Many areas where rare plants and unusual communities occur are already known to the Forest. The Phase II amendment must provide buffers around rare plant areas to prohibit harmful activities such as grazing and ORV use. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 77

Public Concern: The Forest Plan Amendment should designate high-quality montane grasslands as Research Natural Areas.

The highly imperiled montane grasslands (G1S1 plant communities) in the Black Hills must receive full protection under the Phase II amendment to ensure they are not further degraded. The Forest Service has the authority and the responsibility to designate the highest quality montane grasslands as Research Natural Areas as part of the Phase II amendment. They must protect these areas with a 1/2 mile buffer. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 78

Public Concern: The Black Hills National Forest should reduce noxious weeds in previously logged areas.

Weeds are out of control in previously logged areas. This prevents us from keeping the weeds down on our land. (Individual, Deadwood, SD – #24)

PC #: 79

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that improves riparian and meadow health.

The “Restoration Alternative” should ensure restoration of stream, spring, meadow and riparian health by disallowing livestock grazing, mining and other damaging activities within these areas. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 80

Public Concern: The Black Hills National Forest should improve riparian areas.

Work to restore the rich riparian areas, and the associated wildlife, that existed in the early 18th century, prior to the influx of whites into the area. (Individual, Woodland Park, CO – #22)

PC #: 81

Public Concern: The Black Hills National Forest should work with the South Dakota Department of Fish, Game and Parks to reduce ungulate herd density in post-fire areas.

Wild ungulates will be difficult to keep out of regenerating aspen clones and the Service respectfully suggests cooperating with the [South Dakota Department of Fish, Game and Parks] to reduce wild ungulate densities within burned areas. (U.S. Fish and Wildlife Service, Pierre, SD – #59)

PC #: 82

Public Concern: The Forest Plan Amendment should adopt quantifiable standards and guidelines governing vegetative structure.

The Revised Plan tends to substitute vague, discretionary objectives for standards and guidelines. Examples include but are not limited to: Conserve existing hardwood communities and restore historic hardwood communities by 10% (Objective 202); Maintain or establish a minimum of 20% of the forested area of a planning unit to provide for vertical diversity (Objective 206); Manage at least 5% of the forested landbase for late succession (Objectives 207-208); Manage at least 5% of a timber harvest project area for the grass/forb structural stage Objective 209). Given that the early and late successional stages are most important to wildlife and given the preponderance of ponderosa pine across the Forest, the above habitats are critical to wildlife and there is insufficient assurance the Forest Service will provide for these but only “work toward” these endeavors at a slow pace. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 83

Public Concern: The Phase II Draft EIS should not retain overstory conifers in hardwood stands.

We have not and do not support Guideline 2205 to retain 10 overstory conifers/acre because of misuse (in the Northern Black Hills, for example) and new scientific data. We realize that there may be some scenic exceptions for old, large “pumpkins” along some paved highways or leaving one or two old pumpkins for wildlife trees (not for purposes of pine regeneration). But, when overstory conifers are retained, shade intolerant hardwoods cannot compete and the stand eventually converts. We do not support the blanket theory of mixed stands as providing for greater wildlife diversity given the preponderance and proximity of conifer to nearly every hardwood stand in the Black Hills. New scientific research in the Black Hills found that ponderosa pine in aspen stands did not increase bird species richness over the respective pure stands (Rumble, M.A., L.D. Flake, T.R. Mills and B.L. Dykstra. In Press. *Do Pine Trees in Aspen Stands Increase Bird Diversity?*). Aspen and associated deciduous plants have significant potential for aspen-ruffed grouse management. The value of aspen to wildlife, [to] say nothing about aesthetics, fire breaks, etc., is well documented in the scientific literature. Ruffed grouse populations were once common through out the Black Hills years ago, including the Southern Hills. The population decline is attributed to loss of aspen and herbaceous cover. We believe new data and abuse of leaving conifers in hardwood stands warrants further evaluation in Phase II Amendment EIS. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 84

Public Concern: The Forest Plan Amendment should include meadow restoration standards to improve quality and quantity of ungulate forage.

Combined meadow restoration and grass/forb stage amounts to less than 6% of the Forest (excluding the 2000-2001 fire areas). From an historical perspective (including Grave’s 1899 report) the Black Hills contained significantly more open spaces with corresponding increased forage, cover and browse. We support a program to restore, protect and properly manage meadows for forage and cover for both livestock and a variety of wildlife species and again, we support Phase I’s conversion of all environmentally protective guidelines to standards. During the Revised Plan process, BHNF calculated that there was actually insufficient forage on the Forest for all ungulates if wildlife were to remain on the Forest year-round. While we acknowledge that wildlife do move onto private lands, especially during winter, we continue to advocate that improved quantity and quality of forage be produced on the Forest. This could improve herd health and retain big game on the forest longer, thus, reducing depredation and other conflicts on private lands. Meadow restoration could off-set some of the short-comings due to the insufficient grass/forb stage (5%) in conifer forested types, although distribution could remain a problem. It would appear that continued meadow restoration and increases in the grass/forb structural stage would help protect large interconnected habitat blocks for sensitive species and unique plant assemblages. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

Natural Disturbances

PC #: 85

Public Concern: The Forest Plan Amendment should permit natural processes to restore forest health.

I believe the most important issue now is to preserve what is left from the natural forest in the Black Hills. This can only be done with as little impact as possible. Cutting down all the trees that have to respond to a natural disturbance is certainly not a long-term solution for the Black Hills ecology. Every child nowadays knows that there is more to a forest ecosystem than just trees. Fallen – or in this case burned – trees are part of the ecological cycle. (Individual, Hot Springs, SD – #3)

In keeping with this philosophy [of conservation], the natural next step would be a commitment to allow a greater amount of young forests to mature to full growth while not inhibiting natural processes like lightning-strike forest fires or insect outbreaks. I’m no scientist, but it seems to me that by encouraging the habitat, you should “jump start” the species regeneration. (Individual, Longmont, CO – #29)

Spraying pesticides and fighting wildfire is not a way to mimic nature in these forests. If grazing and roading and logging are not perpetuated ad infinitum, natural processes will run their course, as they always have. This Phase II Amendment is being called for to help preserve the natural forest, and restore it. In order for this to occur, the plan must allow for natural processes such as wildfire and insect outbreaks to provide wildlife habitat and ensure long-term forest health. (Individual, Portland, OR – #31)

PC #: 86

Public Concern: The Forest Plan Amendment should facilitate mechanical fuel reduction in overstocked and insect-infected areas.

It makes me sick to see the forest being destroyed by bugs and wildfire, due to your recent lack of forest management. I am also sick of your excuses for not putting up timber sales and taking care of these problems. This whole amendment process I view is just another of those excuses. . . . Sitting on your hands and letting it die and burn up is not what I would call managing the forest. It is time to go back to doing your jobs, or turn it over to someone who will. (Individual, Lead, SD – #12)

Bottom line, the Black Hills National Forest is presently growing significantly more trees than are presently being harvested and killed by insects, disease and fire. That imbalance will not go on forever. We have two choices: We can allow it to swing back the other way wildly through natural processes or in a more controlled manner through the hand of man. I and most other citizens of the Black Hills and the state would prefer the latter. Hopefully you do, too. (Individual, Spearfish, SD – #14)

Our forest needs to be thinned to reduce the fuel loading and improve health and growth. . . . Our forest is in dire need forest management. The current mountain pine beetle infestation has been steadily increasing over the last five years with a huge jump in numbers of trees lost occurring last year. This infestation is putting thousands of acres of overstocked forest at severe risk to mountain pine beetle. We have all seen what has happened in Beaver Park over the last two years. (Lawrence County Commissioners, Deadwood, SD – #2)

PC #: 87

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that promotes forest health by accepting natural disturbances.

The “Restoration Alternative” should ensure restoration and promotion of natural processes such as wildfire, insect outbreaks, and vegetative succession to ensure long-term forest health and provide wildlife and plant habitat. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 88

Public Concern: The Black Hills National Forest should expedite completion of the Forest Plan Amendment to improve forest health.

Many urgent projects need to be completed as soon as possible and cannot be done without completing Phase II. Beetle infestations are growing exponentially and the fire danger is getting way out of hand. We will continue to suffer from these and other forest health issues until the Forest Service gets off their hands and gets back to work. (Individual, Spearfish, SD – #6)

The forest health situation of the Black Hills National Forest continues to deteriorate as the planning process drags on. The Phase I Record of Decision provided virtually no relief from the current Mountain Pine Beetle epidemic. The ability of the Forest to address forest health issues including insects, disease, weather damage, and post-fire salvage and rehabilitation in a timely fashion is an important issue that needs attention. (South Dakota Department of Agriculture, Pierre, SD – #48)

To me, when one person loses their home, possessions, livelihood, or God forbid, their life, I feel it’s classified as catastrophic. When the area around Sturgis, SD, for example, catches fire, I feel that the local firefighters will have a huge battle to fight, a battle that with each delay of the Forest Plan literally grows in potential intensity. Property will be destroyed, livelihoods will be gone, and sadly, lives will probably be lost. The area is such a tinderbox that the fire will rage out of control in such a fashion that people could be trapped in their homes that are spread out in the pines. The few homeowners that have thinned out their own timber might keep their homes from burning, but it is not enough to manage a few homesites to get rid of the problem. Your so-called wilderness area of Beaver Park will look like a war zone in Afghanistan. (Individual, Selle Fourche, SD – #20)

PC #: 89

Public Concern: The Black Hills National Forest should reduce fuel loads on national forest lands adjacent to state and private lands.

Fuel loads in the areas of the beetle epidemic are dangerously high and present a clear threat to adjacent state and private lands, developments and communities. Fuels on National Forest lands that pose a threat to nearby properties need to be addressed. (South Dakota Department of Agriculture, Pierre, SD – #48)

Along with the insect infestation, we have also seen the increasing risk of wildfire our forest is experiencing. We do not want any more Jasper fires. So far, we have been very fortunate in the Northern Hills. As you know, the many acres of private land within the Black Hills are directly impacted by how you manage the Black Hills National Forest. (Lawrence County Commissioners, Deadwood, SD – #2)

The dead trees are a very dangerous situation because if a fire gets started it will take a big area. Lots of small ranches exist in our area and a fire would be devastating. . . . The trees surrounding us are badly infected with pine beetles and are affecting our trees. They need to be cleaned out immediately. (Individual, Deadwood, SD – #24)

PC #: 90

Public Concern: The Black Hills National Forest should focus fire protection efforts on educating and assisting individual property owners.

While we understand protection measures that reduce fire risk need to be taken for those residing within the forest, we believe the most effective action that landowners can undertake to protect their property is to create defensible spaces around their structures. Logging roadless areas or other patches of uncut forest is not necessary to protect private property. The USFS should establish an educational program that teaches landowners effective strategies to protect their structures from wildfire (see e.g., www.firewise.org). (Preservation/Conservation Organization, Boulder, CO – #32)

FCC, NFPA and their membership support the protection of forestland communities and especially the education of homeowners regarding the measures available to “fire-proof” their structures. . . . The likelihood that a home will ignite from wildfire is almost entirely determined by the landscape within 40 meters of the building and by the materials and design of the building (Cohen, Preventing Disaster, 2000; Cohen, Reducing the Wildfire Fire Threat to Homes: Where and How Much, 2000; Cohen, Why Los Alamos Burned, 2000). (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 91

Public Concern: The Black Hills National Forest should not practice fuel management activities outside of the wildland/urban interface.

We are not supportive of commercially driven, activities far away from these communities that will not have a direct impact on the ability of structure and communities to withstand wildland fire, but will jeopardize the viability of threatened, endangered, and sensitive species. The best available science supports a very different scenario for treatments in the wildlands/urban interface than has been the practice on the Black Hills National Forest. Several conclusions can be made based on the best available science: Drought and other climatic factors are the primary causes of large-scale fires, which occur regardless of fuel conditions. (Schmoltdt, Daniel L., et. al., PNW-GTR-455, USFS, 1999); Fire suppression, logging, and grazing are the primary causes of unnatural fuel conditions. (Beschta, et. al., 1995; McIver and Start, PNW-GTR-486, 2000; Schmoltdt, Daniel L., et. al., PNW-GTR-455, USFS, 1999); Management activity, including fuel reduction, beyond 40 meters away from a home has little effect on the likelihood that a home will ignite during a wildfire. (Cohen, Preventing Disaster, 2000; Cohen, Reducing the Wildfire Fire Threat to Homes: Where and How Much, 2000; Cohen, Why Los Alamos Burned, 2000). (Preservation/Conservation Organization, Santa Fe, NM – #33)

Logging roadless areas or other patches of uncut forest is not necessary to protect private property. (Individual, Portland, OR – #31)

PC #: 92

Public Concern: The Black Hills National Forest should reduce highly flammable forest fuels within the wildland/urban interface.

Fuel treatments inside the wildlands/urban interface should be focused on the most flammable of the forest fuels, such as brush, weeds, and the lower branches of the ladder trees and be prioritized around forest communities in the wildland-urban interface. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 93

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that reduces fire risks through prescribed fire in the backcountry and homeowner education in interface areas.

A non-commercial, restoration and education alternative would focus efforts on private homeowner education and assistance while encouraging the re-introduction of fire into the forests outside of the wildlands/urban interface. Homeowner education would include a coordinated program of public presentations, direct mail education materials, media public interest education, and news features. (e.g. www.firewise.org). The local economy could be stimulated through local landscape businesses and construction companies that specialize in retrofitting home sites for fire protection purposes. Further, jobs and income would be generated by activities on federal lands that prepare the forests outside of the wildlands/urban interface for reintroduction of fire, possibly through labor contracts. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 94

Public Concern: The Forest Plan Amendment should allow land managers more flexibility to treat forest health problems.

Phase I, was and is, far too restrictive on local land managers; this must be remedied in Phase II, more flexibility to quickly treat existing and future forest health problems is needed. (Individual, Spearfish, SD – #6)

PC #: 95

Public Concern: The Forest Plan Amendment should include provisions for all multiple uses.

More emphasis needs to be placed on returning to the true mission of the Forest Service providing for all the multiple uses of the forest. (Individual, Spearfish, SD – #6)

PC #: 96

Public Concern: The Black Hills National Forest should include goals and objectives that focus on overall forest health.

Some of the forest health problems that exist on the Black Hills National Forest today have been caused by well-meaning wildlife biologists who seek to create habitat beneficial to a single species without giving ample consideration to the health of the habitat itself. Managing for a healthy forest, as measured by endemic rather than epidemic levels of pests and disease, should be given priority over managing for individual wildlife species. (Individual, Belle Fourche, SD – #7)

PC #: 97

Public Concern: The Forest Plan Amendment should expedite soil stability and pine regeneration in post-fire areas.

Recently burned areas which were part of the suitable timber base should be managed in a way that promotes immediate soil stability and establishment of pine regeneration. (Individual, Belle Fourche, SD – #7)

PC #: 98

Public Concern: The Phase II Draft EIS should address cumulative impacts associated with activities in the Jasper Fire area.

Several significant natural and human caused events on the Black Hills National Forest in the years 2000 and 2001 have changed the management situation. Fires and storm events have impacted the BHNF's timber supply, wildlife habitat, and old growth distribution significantly. The Phase II amendment must address these changed conditions per the NFMA and make the necessary changes in management to ensure wildlife viability. (Preservation/Conservation Organization, Santa Fe, NM – #33)

The Phase II scoping notice continues to ignore the forest-wide shortage of quality snag habitat on the Black Hills National Forest, and the totally unscientific basis on which recruitment snag levels are projected. The Forest has never demonstrated that leaving high snag density areas such as occur within the Jasper Project will not be advantageous to cavity-dependent wildlife. Failure to allow such natural processes continues to disrupt the historical ecological balance on the Black Hills, where a high standing dead component was widely reported by early explorers. The Chief's October 12, 1999, Ruling on our Forest Plan Appeal concluded that the entire BHNF is an area of concern for cavity-dependent species, calling any proposed salvage operation into question. The Phase II Amendment must include the direct, indirect, and cumulative impacts of the Jasper Fire and post-fire salvage activities on the viability of wildlife species forest-wide, before any large-scale activities are authorized. (Preservation/Conservation Organization, Rapid City, SD – #8)

Neither the Revised Plan/FEIS nor Phase I addressed rehabilitation, mitigation and long-term management of trust resources in substantially changed forest/range conditions. This was an issue we raised in the 1990's but which has been elevated in our eyes due to fires, storm damage and subsequent disease and insect outbreaks in 2000-2001. Similar to our frustration in finding Plan direction for travel management, we find the same level of non-direction for resource management following catastrophic events. Revised Plan Objectives 223 – 232 for disturbance processes give little management direction. To allow salvage, hazardous tree removal and sanitation actions to be substituted for guided management or to be considered categorical exclusions is erroneous. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 99

Public Concern: The Black Hills National Forest should manage burned areas to restore their productivity and recreational value.

The Jasper, Elk Mountain, and Roger's Shack burn areas need to be managed to restore them to their former levels of productivity not only for the harvesting of natural, renewable resources, but for all levels of recreation as well. (Individual, Belle Fourche, SD – #20)

PC #: 100

Public Concern: The Forest Plan Amendment should manage for natural disturbances to maintain woodpecker populations.

To maintain viable, well-distributed populations of woodpeckers on the BHNF, the woodpecker experts interviewed for the Phase I amendment emphasized the importance of allowing large-scale, stand replacing fires and beetle infestations to occur in the Black Hills. The Phase II amendment must long-term direction to allow for these processes. In particular, the Phase II amendment must establish direction to maintain snags in the Jasper Fire area (i.e., the same area where the Forest Service recently unleashed a massive salvage logging project). (Preservation/Conservation Organization, Rapid City, SD – #17)

PC #: 101

Public Concern: The Forest Plan Amendment should reduce overstocking through controlled burning.

Due to large-scale excessive logging, only 5 percent of the Hills' original old-growth forests remain. While it is true that the ponderosa pine habitat is too dense, more logging is not the answer, rather, controlled burning is key. (Individual, Grand Junction, CO – #28)

PC #: 102

Public Concern: The Phase II Draft EIS should analyze impacts of aggressive management on wildlife viability.

Given the misleading NOI for this Amendment, we fear that the Forest is again refusing to comprehensively address the viability problem and other pressing issues on the Forest before authorizing resumption of activities with impacts that are not understood. The Forest has failed to address whether roadbuilding and even-aged management prescriptions (e.g., seed, shelterwood, and overstory removal cuts) are appropriate actions for maintaining wildlife options, and has failed to withdraw proposed logging of goshawk habitat on older forest remnants to compensate for the significant loss of goshawk habitat in the Jasper Fire area. We request that these concerns be fully considered in a draft EIS before any further resource commitments are made on the Black Hills National Forest.

(Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 103

Public Concern: The Black Hills National Forest should reconsider Management Area designations.

Since the 2000-2001 fires have changed forest conditions, we would like to know if BBNF has identified changing MA designations for some areas as an Amendment issue. For example, fire areas outside of current MA 5.4 may be appropriately re-designated as wildlife emphasis or RNA's. Current roadless areas and their future designations or allowed uses are also of interest to us. GFP would like the opportunity to meet with BBNF to discuss ideas and possible changes to MA designations and current uses (consumptive and non-consumptive, extractive and non-extractive) or additions of new MA types. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 104

Public Concern: The Black Hills National Forest should evaluate landscape changes in cooperation with the South Dakota Department of Game, Fish and Parks.

I believe these large-scale fires have contributed to significant landscape changes, dynamic changes that we do not immediately know nor can identify until time has passed and post-fire conditions have been evaluated and re-evaluated. In fact, our agency has taken a direct role in better understanding fire processes by co-hosting an aspen tour with Dale Bartos of the RMRS in Utah and the RMRS in Rapid City, to heighten the awareness of aspen management. From that tour, we committed to cost-sharing the expense for aerial flights and photo interpretation of burned areas to better identify abundance and location of quaking aspen, other hardwoods and shrubs. With this information, we plan to jointly work with the Forest to identify key plant assemblages, such as aspen stands (a Management Indicator Species). Once areas are identified, we will help the Forest develop criteria and rank areas for various management options which could include, but are not limited to, additional post-fire monitoring, adjusted wildlife management goals and/or protection through fencing or other means. Our agency has committed funding to help achieve these needs. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 105

Public Concern: The Black Hills National Forest should consider public concerns and biological assessments prior to resuming grazing in disturbed areas.

While BAER and in-house reports (such as the Jasper Fire Rapid Assessment Report) can be good baselines to evaluate immediate remediation needs following fire, they are guiding documents, not decision documents. We quote a rather presumptive, bold statement by BBNF that was intended to endure the life of Phase I: "current proposals and actions being taken within the Jasper fire area are appropriate and will not contribute to further environmental damage in that area." (Phase I Amendment Decision Notice page DN-15). We take issue with this broad statement. While timber salvaging and travel management after the Jasper Fire were open for public involvement and biological or environmental assessments, resumption of livestock grazing was not. It seems highly inequitable that two forest uses or commodities; timber and recreation/access, were subject to public scoping following a large-scale, catastrophic event, but livestock grazing and range management were not. We absolutely do not understand the omission of proper resource management following landscape-altering events. Neither Phase I,

nor the Revised Plan assures that proper and restorative measures (as often identified by your own Staff) will take place to impacted landscapes. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 106

Public Concern: The Black Hills National Forest should manage burned areas to promote hardwood and shrub regeneration.

We have not analyzed the management area designations for all fires, but specifically for Jasper, it encompassed approximately 50% of MA 5.1 and 50% MA 5.4. The Forest Plan states that MA 5.4 are specifically managed to provide effective thermal and hiding cover for wildlife with a winter range emphasis. Although thermal cover is essentially gone, in the interim, regenerating hardwoods and shrubs will provide some security cover if properly managed. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

Special Areas

PC #: 107

Public Concern: The Forest Plan Amendment should protect all roadless areas of 1,000 acres or more from logging, road-building, livestock, and off-road vehicle use.

There should be as many areas as possible with no roads or tracks. Please protect all currently roadless areas over 1000 acres in size, allow no new roads at all for a period of perhaps 10 years, and designate some areas for complete protection so that species have some safe quiet places to survive. (Individual, Laramie, WY – #10)

I urge your agency to preserve the limited access to the roadless areas that now exists, and to provide full protection for all areas over 1,000 acres from logging, road building, livestock grazing and ORV (off-road vehicle) use in order to maintain the near-pristine and undisturbed habitat within. This protection should be ensured either by designating these areas as research natural areas (RNAs), or by designating them as being wilderness, or by site-specific management within this Phase II amendment, to ensure they are preserved for future generations. These areas are part of the legacy we leave for the future generations of forest inhabitants, as well as for our children. Their value is not in short-term commercial activities, but rather in the long-term preservation of natural processes of wildlife and plant species that are sensitive to human disturbance, which up till now have for the most part been left to run their course, undisturbed by roading or logging. (Individual, Portland, OR – #31)

The importance of roadless areas on the Black Hills to sensitive wildlife and plant species is unmatched anywhere else on the forest. Access is extremely limited, many of these areas have never been subjected to logging, and natural processes have – for the most part – been allowed to run their course, creating and sustaining healthy and natural habitat. Unfortunately, roadless areas on the Black Hills are few. Only two are over 5,000 acres and all are threatened as logging and road building encroach upon their undeveloped interiors. The Phase II Amendment needs to provide full protection from logging, road building, livestock grazing and off-road vehicle use to roadless areas over 1,000 acres in size in order to maintain the near-pristine and undisturbed habitat within them and to provide for species viability and diversity. Protection should come either from research natural area (RNA) designation, wilderness recommendation, or from site-specific management direction within the Phase II Amendment. The following roadless areas should be fully protected by the Phase II Amendment: Beaver Park roadless area; Inyan Kara roadless area; Sand Creek roadless area; Elk Mountain roadless area; Pilger Mountain roadless area; Stagebarn Canyon roadless area; Sheep's Nose roadless area in the southeast corner of the Bear Lodge Mountains; Black Elk Wilderness Additions. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 108

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that protects all roadless areas larger than 1,000 acres.

Within this Restoration Alternative, I implore your agency to . . . protect all roadless areas over 1,000 acres. (Individual, Portland, OR – #31)

The "Restoration Alternative" should ensure full protection of all roadless areas – inventoried and uninventoried – greater than 1,000 acres from logging, roadbuilding, livestock grazing, mining and off-road vehicle use. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 109

Public Concern: The Forest Plan Amendment should preserve all roadless areas of 160 acres and larger.

Fully preserve all Roadless Areas 160 acres and larger. (Individual, Minneapolis, MN – #40)

PC #: 110

Public Concern: The Forest Plan Amendment should not designate additional wilderness management areas or Research Natural Areas.

We oppose additional wilderness and Research Natural Area designations coming out of the Phase II process. (Multiple Use/Land Rights Organization, Hulett, WY – #44)

It is our opinion, based upon the Forest Service definitions, that there are no areas within Crook County that are suitable for Research Natural Areas (RNAs) or Wilderness designations. Sand Creek, an area focused on in past studies, is a roaded area and is not a good candidate for either designation. (Crook County Commissioners, Sundance, WY – #57)

PC #: 111

Public Concern: The Forest Plan Amendment should recommend additional areas for wilderness designation.

UPPER SAND CREEK

As to special area designations, there are several that merit consideration: The upper Sand Creek area has some of the last truly old-growth ponderosa pine left in the entire BHNF. Since this is also the largest, and most pristine area left on the whole forest (other than the Norbeck Wildlife Preserve areas in conjunction with the Black Elk Wilderness), it's an excellent candidate for inclusion in the National Wilderness Preservation System (NWPS). The existing 9800-acre Black Elk Wilderness (BEW) simply isn't enough for a 1.2 million acre forest, and the 1997 management plan revision identified the BEW as already at, or over, capacity for visitor use. (Individual, Woodland Park, CO – #22)

PILGER MOUNTAIN

The Pilger Mountain area represents a type of ecosystem completely lacking in the Rocky Mountain Region's inventory of wilderness: The "Southern Black Hills Forest and Grassland" ecotype. This unusual blend of grassland and forest occurs in few places on the continent, and except for a few fading remnants of grazing permittee activity, is unmarred by roads and other developments. Use of off-road vehicles is slight – almost non-existent – here, and this area merits the protection of designation as wilderness. (Individual, Woodland Park, CO – #22)

BLACK ELK WILDERNESS ADDITIONS

Please re-consider your decision not to recommend the Norbeck additions to the Black Elk Wilderness. Several areas immediately adjacent to the Black Elk Wilderness would make excellent additions to that wilderness, since they contain the same sorts of rock outcroppings and old-growth spruce/fir forests that the BEW does. A larger Black Elk Wilderness would therefore be able to sustain larger and more diverse populations of the wildlife that depend upon that habitat to survive. To state that the Norbeck Wildlife Preserve's enabling legislation was specific as to its intended direction of "wildlife habitat" does not preclude inclusion in the NWPS. (Individual, Woodland Park, CO – #22)

JASPER FIRE AREA

I strongly recommend that the Jasper Fire Area be given a Wilderness designation with the reintroduction of bison which were indigenous to this area. It is unforgivable that the United States has allowed the almost complete destruction of the Black Hills, the oldest mountains in the world with its own unique environment. Designating the Jasper Fire Area as wilderness, out of the millions of acres that are open for roads and development, would show some semblance of integrity and responsibility to future generations on the part of the United States. I hope that your decision reflects such responsibility and integrity. (Individual, Wakpala, SD – #54)

PC #: 112

Public Concern: The Phase II Draft EIS should evaluate protective management designations.

Wilderness questions are important ones facing the Forest. Wilderness designation can protect watersheds and sustain biodiversity more effectively than other tools and use designations such as RNAs. Roadless areas that may be eligible for wilderness designation should be reviewed. Following that review, recommendations should be made for wilderness through the planning process. When management designation of RNAs and roadless areas is recommended, it would be preferable to indicate where wilderness designation would be appropriate or possible to protect unique Forest values and provide a higher level of natural resource protection. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 113

Public Concern: The Phase II Draft EIS should reinventory all roadless areas of 1,000 acres or more.

The Phase II environmental analysis should include a new on-the-ground roadless area inventory in order to identify previously unidentified roadless areas over 1,000 acres in size. This inventory should use only well-developed, constructed (blade or cut and fill only), regularly maintained (once a year) and regularly used (at least once a week throughout the year) routes as criteria for determining roadless area boundaries. Routes such as two-tracks, user-created routes, routes with year-long closures, unmaintained routes, or environmentally damaging routes should not disqualify lands from roadless area designation. (Individual, Portland, OR – #31)

PC #: 114

Public Concern: The Forest Plan Amendment should not include analysis of potential Research Natural Areas.

If the Black Hills National Forest has not been specifically mandated to include an analysis of potential Research Natural Areas in this particular Forest Plan Amendment, it should not be included. Such an analysis would only serve to delay the eventual implementation of this amendment. Because it is imperative that the Phase II Amendment be implemented as soon as possible, any analysis which is not specifically required to be included in this amendment should not be included. (Individual, Belle Fourche, SD – #7)

PC #: 115

Public Concern: The Black Hills National Forest should not impair potential Research Natural Area sites.

Until the Forest Service prepares the legally-required RNA review, no activities that could impair potential RNA sites can be legally authorized on the Black Hills National Forest. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 116

Public Concern: The Forest Plan Amendment should designate all montane grasslands as Research Natural Areas.

To protect the few remaining high-quality and highly imperiled montane grasslands on the Black Hills, these areas – together with 1/2 mile no-activity buffers – must be designated as Research Natural Areas through the Phase II amendment. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 117

Public Concern: The Forest Plan Amendment should designate Research Natural Areas to protect premier natural features.

Research Natural Areas must be designated in order to provide protection to unique and rare plant communities, geological features, and other natural features, as well as ecological representatives of forest environments for the purpose of scientific research and educational opportunities. These areas are quite limited on the Black Hills due to

the impacts of past human activities on the Black Hills and through major ecological transformation, such as the introduction of normative species. Although RNAs may exhibit impacts of human activities, they are generally pristine and their size is commensurate with the natural value that is protected. It is imperative the Forest Service designate a system of RNAs on the Black Hills because of its unique ecoregional characteristics, because of the existence of rare plant communities that are threatened, and because future opportunities to protect RNAs are becoming fewer and fewer. The Rocky Mountain Regional Office of the USFS has directed that RNAs be established for each plant community type in an ecoregion. Given that the BHNF is its own ecoregion under the Bailey-Kuchler system, it is imperative the USFS designate a fully representative system of vegetation community RNAs. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of these areas as potential RNAs and designate those RNAs that best represent the ecological conditions needed to complete the natural area system on the Black Hills. (Preservation/Conservation Organization, Boulder, CO – #32)

The unique biological and geological areas on the Black Hills National Forest deserve special protection. I support Research Natural Area designation for these areas as the highest form of administrative protection that your agency can provide. I support the comprehensive review of the entire Black Hills National Forest that you have agreed to perform in amending the Forest Plan under the Beaver Park settlement agreement, and urge you to identify and protect as many of these special areas as you possibly can. (Individual, Brookings, SD – #51)

Designate Natural Areas to protect the best examples of all native plant communities and other natural features on the Forest-for their natural wealth and scientific value. Natural Areas are designated in order to provide protection to unique and rare plant communities, geological features, and other natural features, as well as ecological representatives of forest environments for the purpose of scientific research and educational opportunities. In the selection of representative areas, a pristine condition is the goal. However, when candidate areas in a pristine condition are unavailable, then areas that reflect the pristine conditions closely as possible may be selected. (Preservation/Conservation Organization, Missoula, MT – #422)

PC #: 118

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that designates Research Natural Areas.

Within this Restoration Alternative, I implore your agency to designate Research Natural Areas to protect the best examples of all native plant communities and other natural features on the Forest – for their natural wealth and scientific value. (Individual, Portland, OR – #18)

PC #: 119

Public Concern: The Forest Plan Amendment should designate Elk Mountain as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Elk Mountain. Dry coniferous forests and woodlands (including old growth), and dry and mesic mixed grass prairies are the types best represented. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 120

Public Concern: The Forest Plan Amendment should designate the Swede Gulch/Black Fox area as a Research Natural Area.

The Swede Gulch/Black Fox area also contains some excellent pockets of old growth ponderosa pine, and also some relatively rare (in this area) stands of white spruce. This makes the area a prime candidate for a Research Natural Area, or another inclusion in the NWPS. The abundance of natural springs in these two valleys, in combination with the old trees, makes the area absolutely unique, in terms of vegetative diversity. (Individual, Woodland Park, CO – #22)

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Black Fox. Mesic coniferous forests and woodlands (including old growth) are well represented. There is a large complex of riparian forest, shrubland and herbaceous types. This area has the only peat bog known in the Black Hills and many rare species including meadow jumping mice. This is a good site for Black Hills redbelly snakes and smooth green snakes as appropriate habitat is available and these animals have been

observed. Also, there are populations of the *Oreohelix cooperi* here. The full drainages of both upstream forks of Rapid Creek should be included, and downstream from Black Fox as far as possible. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 121

Public Concern: The Forest Plan Amendment should designate Canyon City as an Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Canyon City. Mesic coniferous forests and woodlands (including old growth), dry riparian types and high elevation riparian types are well-represented. The best example of water birch shrubland, a type that is relatively uncommon and restricted in the Black Hills, was found at this site. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 122

Public Concern: The Forest Plan Amendment should designate Cranberry Springs as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Cranberry Springs. The area is a mosaic of community types. Mesic coniferous forest and woodlands (including old growth), dry riparian types and upland hardwoods are well-represented. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 123

Public Concern: The Forest Plan Amendment should designate Sand Creek Headwaters as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Sand Creek Headwaters. Upper headwaters area has mosaic of bulrush/cattail. Beaked sedge and Bebb willow shrubland communities are present in wet meadows. Paper birch/beaked hazel communities in the drainage bottoms. Hawthorne stands in gulches as well. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 124

Public Concern: The Forest Plan Amendment should designate McIntosh Fen as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of McIntosh Fen. A relatively small site, but is located within a unique habitat in the Black Hills. Only four community types were identified at McIntosh Fen, but the small pockets of willow shrublands are rare, and may be the last relict of a once-more-extensive type. Currently managed as a Botanical Area, and restoration of the natural water regime is underway in hopes of reinvigorating the native plant communities. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 125

Public Concern: The Forest Plan Amendment should designate Beaver Park as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Beaver Park. Community types include: Paper birch/hazel forest, ponderosa pine/little bluestem woodland, ponderosa pine/rough-leaf ricegrass woodland, bur oak-ironwood forest, ponderosa pine/bearberry woodland, ponderosa pine/chokecherry forest. Doug Backlund of the South Dakota Department of Game and Fish has stated, "Beaver Park would make a good RNA, the FS did not salvage log this, as far as I know. With all the bug-killed trees opening up the pine forest, it will become a very unique place." (Preservation/Conservation Organization, Boulder, CO – #32)

I support Research Natural Area designation for . . . the Beaver Park Roadless Area and sufficient surrounding area to constitute a viable ponderosa pine ecosystem where natural processes can be restored. (Individual, Bookings, SD – #51)

PC #: 126

Public Concern: The Forest Plan Amendment should designate Hell Canyon North as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Hell Canyon North. This site is a large area with a mix of coniferous types, including old growth stands. Community types include: Aspen/chokecherry forest, ponderosa pine/bearberry woodland, ponderosa pine/little bluestem woodland, ponderosa pine/mountain ninebark forest, ponderosa pine/rocky mountain juniper woodland, ponderosa pine/common juniper woodland. There are two caves in West Hell Canyon that could be included in a RNA. They are located in sections 3 and 10, T3S R2E. This could be included in the Hell Canyon North. One cave typically has 200+ Townsend's big-eared bats hibernating. Outside of Jewel Cave, this is the largest hibernaculum of Townsend's known in the Black Hills. The other has a large population of Myotis species that hibernate each winter. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 127

Public Concern: The Forest Plan Amendment should designate Hell Canyon South as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Hell Canyon South. Community types include: Mountain mahogany/side-oats grama shrubland, ponderosa pine/rocky mountain juniper woodland, western wheatgrass-green needlegrass mixedgrass prairie. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 128

Public Concern: The Forest Plan Amendment should combine Hell Canyon North and Hell Canyon South with the Jewel Cave National Monument.

The agency should, with National Park Service cooperation, combine Hell Canyon North and Hell Canyon South with Jewel Cave National Monument through the Phase II Amendment. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 129

Public Concern: The Forest Plan Amendment should designate Vanocker Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Vanocker Creek. Contains at least one high quality example of plains riparian forests and shrubland. Community types include: Bur oak-ironwood forest, ponderosa pine/bur oak woodland, western snowberry shrubland, creeping juniper/little bluestem dwarf-shrubland, northern great plains little bluestem prairie, ponderosa pine/little bluestem woodland. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 130

Public Concern: The Forest Plan Amendment should designate Little Spearfish Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Little Spearfish Creek. Includes a diversity of high-ranking riparian and wet meadow types. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 131

Public Concern: The Forest Plan Amendment should designate Spearfish Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Spearfish Creek. Community types include: White Spruce Alluvial Black Hills Forest, Beaked Willow Scrub, Narrowleaf cottonwood/red-osier dogwood forest, Nebraska sedge wet meadow, peach-leaf willow woodland (lower quality stand, but only occurrence found in BHCI). (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 132

Public Concern: The Forest Plan Amendment should designate Little Elk Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Little Elk Creek. Contains at least one high quality example of plains riparian forests and shrubland. Community types include: Beaked willow shrub, western great plains streamside vegetation, narrowleaf cottonwood/red-osier dogwood forest, northern great plains cattail marsh. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 133

Public Concern: The Forest Plan Amendment should designate Buskala Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Buskala Creek. Community types include: White spruce/grouseberry forest. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 134

Public Concern: The Forest Plan Amendment should designate Gillette Canyon Headwaters & Upper Gillette Canyon as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Gillette Canyon Headwaters & Upper Gillette Canyon. Forb-rich grassland in very broad drainage bottoms; mostly native species; more cover in more mesic areas (bottoms vs. slopes). Mostly native species; allotment north of Sixmile road is more heavily utilized and soon drops in condition going north. There is one area that might be joined with the upper Gillette Canyon area, which includes three caves in T2S R2E Sec. 16,17,18, 20 and 21. The caves are Ice, Igloo, and Bear Trap caves. These caves are shown on the USGS 7.5' quads Preacher Spring and Dead Horse Flats. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 135

Public Concern: The Forest Plan Amendment should designate Reynolds Prairie as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Reynolds Prairie. Large prairie on rolling uplands with shallow drainages; grassland with areas of high forb density. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 136

Public Concern: The Forest Plan Amendment should designate Battle Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Battle Creek. Community types include: Aspen/beaked hazel forest, BH streamside vegetation, bur oak-ironwood forest, paper birch/hazel forest, ponderosa pine/bearberry woodland, ponderosa pine/bur oak woodland, ponderosa pine/chokecherry forest, ponderosa pine/little bluestem woodland, ponderosa

pine/common juniper woodland, and sandbar willow shrubland. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 137

Public Concern: The Forest Plan Amendment should designate Geis Spring as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Geis Spring. Community types include: Bur oak-ironwood forest, paper birch/hazel forest, ponderosa pine/bur oak woodland, ponderosa pine/rough-leaf ricegrass woodland.

(Preservation/Conservation Organization, Boulder, CO – #32)

PC Date:

PC #: 138

Public Concern: The Forest Plan Amendment should designate Stagebarn Canyon as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Stagebarn Canyon. Dave Holden calls this site “Botany Canyon” and listed it on his SD Natural Heritage Site list (Holden, D.J. 1981. *Dakota Visions: A County Approach*. Center for Western Studies, Augustana College). There is a white spruce-twinflower forest and records of abundant yellow lady’s slipper orchids (*Cypripedium calceolus*). There are several caves in the area, one, Erskine Cave, is an important hibernaculum for Townsend’s big-eared bats and is a night roost for several species including the fringed-tailed myotis. Another cave, Ice Cave, is a night roost and hibernaculum for Townsend’s big-eared bat. Both caves and the canyon are shown on the USGS 7.5’ quad, Piedmont. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 139

Public Concern: The Forest Plan Amendment should designate special protection for the Stagebarn Canyon area.

The Stagebarn Canyon area contains several species of plants that are threatened, or of special concern. A “Botanical Area” Designation, or some designation that allows for limited non-motorized use that also protects the native vegetation, would be appropriate here. (Individual, Woodland Park, CO – #22)

PC #: 140

Public Concern: The Forest Plan Amendment should designate a Limestone Plateau Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Limestone Plateau. We feel that there is great potential for a limestone plateau RNA and that a combination of some of the following areas might be combined to form a larger site: Keough Draw; Powerline Draw; Buskala Creek; Redbird Draw; Upper Beaver Creek; Upper Castle Creek; Upper Dry Beaver Creek; Remington Camp; Bear Spring/Lemming Draw; and Gillette Canyon area. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 141

Public Concern: The Forest Plan Amendment should designate Inyan Kara Mountain as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of Inyan Kara Mountain. This basaltic pluton on the Bear Lodge District is a unique geologic feature that contains many archaeological resources and exhibits limited human impacts.

(Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 142

Public Concern: The Forest Plan Amendment should designate French Creek as a Research Natural Area.

This area may have great potential for RNA designation. We urge the agency to conduct full evaluations through the Phase II Amendment analysis of French Creek area. There are a few streams here where native fish species persist. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 143

Public Concern: The Forest Plan Amendment should designate Calamity Peak as a Research Natural Area.

The requirements of a Research Natural Area are that it must have some unique aspects. Certainly the Calamity Peak area, with its extraordinary granite spires extending all the way to the Needles range, and encompassing rare fern flora found in only one other state of the United States, nesting eagles, mountain goats, elk, wild turkeys and other wildlife and native plants in a scenic and biodiversity value far outweighs the timber value, and the natural and undisturbed stat of this area would be permanently impaired by logging. (Individual, Custer, SD – #49)

I support Research Natural Area designation for the Calamity Peak area of the Goat and Needles Timber Sale areas identified by petition of Custer-area landowners, of sufficient size to protect the unique geological and biological resources of this granite outcrop area. (Individual, Bookings, SD – #51)

PC #: 144

Public Concern: The Forest Plan Amendment should protect the Calamity Peak Area from timber harvest.

Because approximately 5000 acres, which the Sierra Club had previously negotiated for protection from timber harvest for studying Old Growth Forests, was lost in the Jasper Fire, the Sierra Club would like to include the Calamity Peak Area in a larger area protected from timber harvest, either as a Back Country Recreation Area – or an even larger area needed for the purpose of studying Old Growth Forests. (Preservation/Conservation Organization, Custer, SD – #49)

PC #: 145

Public Concern: The Forest Plan Amendment should designate portions of the Jasper fire area as a Research Natural Area.

I support Research Natural Area designation for the high-quality montane grasslands or “floral valleys” in the Jasper Fire Area, including the Lemming Draw and Gillette Canyon areas, and other areas of the higher Black Hills. (Individual, Brookings, SD – #51)

PC #: 146

Public Concern: The Phase II Draft EIS should identify discrete research needs prior to designating additional Research Natural Areas.

Research Natural Areas should only be designated after having established a discrete and practically useful purpose and scope for proposed study. (Individual, Rapid City, SD – #52)

Prior to allocating acreage to RNA designation, we recommend that research needs should first be identified by BHNF personnel in cooperation with the Rocky Mountain Research Station including the local Rapid City Unit, and other resource specialists. Subject matter could include, but is not limited to, unique habitats that are not widespread within the Black Hills and study of post-fire or post-disturbance succession. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

Wildlife

PC #: 147

Public Concern: The Phase II Draft EIS should evaluate species viability using only data relating to the Black Hills ecosystem.

When species viability is assessed and analyzed, only data relating to the Black Hills ecosystem should be utilized. It is highly inappropriate and potentially inaccurate to use data tied to unrelated ecosystems. Species viability is a new and emerging science. Theories applied to the management of the Black Hills National Forest must be based on applied science. (Wood Products Industry/Association, Hulett, WY – #19)

Because the Amendment is supposed to focus on species viability and diversity throughout the process we want to see only data and information relating directly to species in the Black Hills National Forest used. (Multiple Use/Land Rights Organization, Hulett, WY – #44)

PC #: 148

Public Concern: The Forest Plan Amendment should balance wildlife viability with other objectives.

There needs to be balance when assessing wildlife population viability. Concerns about wildlife should not preclude consideration of other important aspects of the Forest such as multiple uses objectives and the overall health of the Forest. (Multiple Use/Land Rights Organization, Hulett, WY – #44)

The assessment of wildlife species population viability must be weighted equitably within the context of all other multiple uses, meaning that wildlife concerns should not be regarded as trumping all other multiple use objectives. (Individual, Rapid City, SD – #52)

For the last 8 years, I have seen this forest go backwards from analysis paralysis. Every year seems to be worse than the year before. Wildlife and sensitive species concerns have far outweighed other multiple use objectives and forest health needs. This has got to stop. (Individual, Spearfish, SD – #14)

PC #: 149

Public Concern: The Forest Plan Amendment should implement plans for long-term survival and viability of wildlife species.

Increasingly the Black Hills is “under siege” due to contiguous private land development, and the resultant loss of natural diversity, including the American marten, northern flying squirrel, and the northern goshawk. Also, as you know, current state studies indicate that the Black Hills provides the most critical habitat for the Great Plains puma (mountain lion). Phase II should provide plans to address the long-term survival of wildlife, including the puma, bighorn sheep, goshawks, land snails, pygmy nuthatches, etc. (Individual, Grand Junction, CO – #28)

PC #: 150

Public Concern: The Phase II Draft EIS should support viability determinations with sound analysis.

[Due to] the geographic and biological isolation of the Black Hills, viability is of particularly great significance. Once a species is extirpated from the Black Hills it may never again exist within this forest. The only way to bring a species back is through costly restoration. All viability determinations made for the Phase II Amendment should therefore be backed by a significant amount of credible, consistent and up-to-date scientific data that ensures an accurate and defensible viability determination and that habitat is in fact enhanced across the forest. (Preservation/Conservation Organization, Santa Fe, NM – #33)

The USFS needs to assume, for the purposes of the Phase II Amendment environmental analysis, that Current populations of native species and their habitats are not viable nor are they well distributed. This approach reflects the primary purpose of the Phase II Amendment: to obtain consistent and up-to-date scientific data and monitoring data in order to determine what a viable and well distributed population is and provide management direction that meets that requirement. A primary deficiency in the 1997 Forest Plan is that the USFS assumed that current populations were viable, and provided no consistent rationale or scientific data that supported this assumption. This is a glaring management error. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 151

Public Concern: The Phase II Draft EIS should base species viability and distribution analysis on on-the-ground population data.

The environmental analysis for the Phase II Amendment must include . . . actual (i.e., a number) species population data that presents current status in terms of trends and distribution. (Preservation/Conservation Organization, Boulder, CO – #32)

The plain language of the [NFMA] regulations thus require the Forest Service to protect the viability of species on land under its jurisdiction by determining . . . the estimated numbers and distribution of reproductive individuals across the planning area. . . . Forest Plan Revisions and the FEISs accompanying these revisions must be based upon up-to-date and accurate information about historic and current population status, trends, and distribution in relation to the planning area, and assess viability with reference to anticipated changes in the quantity, quality, and distribution of specific habitat components. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 152

Public Concern: The Forest Plan Amendment should prohibit logging, grazing and off-road vehicle use where species populations are threatened or data is lacking.

Where population or habitat data is lacking in the analysis, the USFS must provide management direction that disallows activities such as logging, grazing and off-road vehicle use in all existing or potential suitable habitats and guarantee no impacts to known or potential populations while obtaining this information. Where viability is determined to be threatened for a particular species, no activities – including fire suppression – should be allowed in all existing or potential habitat. The Phase II Amendment should provide management direction that errs on the side of wildlife, instead of subjecting native species of plants and animals to unnecessary risks. (Preservation/Conservation Organization, Boulder, CO – #32)

For the Forest Service to meet its viability responsibility, the Phase II Amendment environmental analysis should include actual population data. Without this information, it is unknown if viable populations actually exist. Where population or habitat data is lacking in the analysis, the Forest Service should disallow activities such as logging, grazing and off-road vehicle use in all existing or potential suitable habitats and ensure no impacts to populations while obtaining this information. Where viability is determined to be threatened for a particular species, no activities – including fire suppression- should be allowed in all existing or potential habitat or where populations are known to or may occur. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 153

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that prohibits logging, grazing and off-road vehicle use where species populations are threatened or data is lacking.

Where population or habitat data is lacking in the analysis, the “Restoration Alternative” should provide direction that disallows activities such as logging, grazing and off-road vehicle use in all existing or potential suitable habitats and ensure no impacts to populations while obtaining this information. Where viability is determined to be threatened for a particular species through the Phase II analysis, the “Restoration Alternative” should ensure that no activities – including fire suppression – be allowed in all existing or potential habitat or where populations are known to or may occur. The “Restoration Alternative” should provide management direction that errs on the side of wildlife, instead of subjecting native species of plants and animals to unnecessary risks. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 154

Public Concern: The Phase II Draft EIS should base habitat analysis of existing and projected needs for wildlife on current data.

The environmental analysis for the Phase II Amendment must include species’ habitat data that is both quantitative and qualitative that presents current status in terms of trends and distribution . . . [and] actual habitat needs of

species presented in detail and supported by consistent and up-to-date scientific findings.
(Preservation/Conservation Organization, Boulder, CO – #32)

The plain language of the [NFMA] regulations thus require the Forest Service to protect the viability of species on land under its jurisdiction by determining . . . that the habitat requirements necessary to support, at least, a minimum number of reproductive individuals have been met. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 155

Public Concern: The Phase II Draft EIS should evaluate population objectives based on quantified, current data.

The environmental analysis for the Phase II Amendment must include viability objectives that include the estimated numbers and distribution of reproductive individuals needed to ensure its continued existence is well distributed throughout the planning area, and that is supported by consistent and up-to-date scientific data. Viability objectives and determinations should take into consideration the potential for natural disturbances to occur (e.g. fire, windthrow, insect mortality, etc.) as well as human disturbances occurring within the BHNF ecosystem.
(Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 156

Public Concern: The Phase II Draft EIS should address intra-species interaction within the planning area.

The environmental analysis for the Phase II Amendment must include . . . an explanation as to how individuals are able to interact with other individuals within the Black Hills. (Preservation/Conservation Organization, Boulder, CO – #32)

The plain language of the [NFMA] regulations thus require the Forest Service to protect the viability of species on land under its jurisdiction by determining . . . that the distribution of habitat ensures that individuals can interact with others in the planning area. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 157

Public Concern: The Phase II Draft EIS should not include viability requirements for undesirable non-native species.

The environmental analysis for the Phase II Amendment must include . . . a desirability analysis and determination for non-native species, in which those non-native species found to be undesirable are excluded from the viability requirement. For all non-native species that are found to adversely impact native species (e.g. non-native fish negatively impacting native fish species), the viability requirement should not be applicable. Additionally, this determination should not be based solely on the direct economic value of a certain non-native species, but rather ecological necessity (e.g. if removed, the impacts to a native species may be detrimental to its existence).
(Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 158

Public Concern: The Phase II Draft EIS should describe the impacts of various management options on wildlife habitat.

Regarding the presentation of information on wildlife habitat, please describe the tradeoffs associated with various management options. For example, understanding the effects of tree removal and reduced numbers of dead, standing trees is important for EIS reviewers to understand the pros and cons for wildlife species. The document should address: the effects of the proposed alternative actions on the maintenance of diversity and on the abundance of existing species populations. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 159

Public Concern: The Phase II Draft EIS should evaluate wildlife habitat and impacts at a landscape scale.

A landscape scale perspective is generally appropriate to evaluate wildlife habitat and impacts unless the presence of biotic species that inhabit a wide range of landscapes indicates a need for a larger scale (e.g., wide ranging predators or neo-tropical birds). (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 160

Public Concern: The Forest Plan Amendment should establish goals and objectives for a variety of wildlife habitats.

In general, we believe that Black Hills National Forest should be actively managed for a variety of wildlife habitats from grasses and seedlings to mature and old growth forests. Forest management practices such as timber harvest, prescribed burning, and other silvicultural and wildlife management practices are the best and most efficient means to accomplish many of these objectives. . . . Specific, easily identifiable and measurable goals for all wildlife habitats should continue to be provided for and single species management should be avoided. (Recreational Organization, Edgefield, SC – #1)

PC #: 161

Public Concern: The Phase II Draft EIS should consider non-game species.

Please consider non-game species in your planning. (Individual, Grand Junction, CO – #28)

PC #: 162

Public Concern: The Forest Plan Amendment should provide strong protection for sensitive wildlife species.

We are concerned that the Phase II Amendment to the Forest Plan for the Black Hills ensure healthy populations of goshawks, land snails, pygmy nuthatches, and other wildlife by providing strong protection measures. (Preservation/Conservation Organization, No Address – #30)

PC #: 163

Public Concern: The Forest Plan Amendment should implement conservation strategies for imperiled special status species.

Conservation strategies should be developed for snag dependent species in order to determine the soft and hard snag densities, heights, and widths and snag retention numbers necessary to ensure viability of these species on the Black Hills. (Individual, Portland, OR – #31)

The USFS must develop specific conservation strategies for imperiled species on the Black Hills National Forest in order to ensure viable and well distributed populations of these species. This is in accordance with FSM direction. . . . Additionally, the development of conservation strategies is supported by recommendations made in the Expert Interview Summary for the Phase II Amendment (see e.g. Expert Interview Summary pp. 43, 62, and 81). Management direction for the Phase II Amendment should be based on goals and objectives identified and developed in conservation strategies for individual imperiled sensitive species, management indicator species, threatened and endangered species and other vulnerable species (“special status species”) and their habitat. Conservation strategies should provide stronger protection than what is provided for by the Phase I Amendment. Additionally, conservation strategies should provide direction that ensures restoration of an imperiled special status species in the advent of an unforeseeable occurrence that may extirpate a species. (Preservation/Conservation Organization, Boulder, CO – #32)

The Black Hills of South Dakota and Wyoming is an important area of natural diversity that supports many imperiled species such as the northern goshawk, Osprey, American marten, three-toed woodpecker, black-backed woodpecker, Lewis’s woodpecker, black-tailed prairie dog, Cooper’s Rocky Mountain Snail and Striate Disc Snail. Because of a century of land mismanagement, mining pollution, livestock over-grazing and unsustainable logging, there is now less than 5% of old growth forest habitat. As a result, many species of animals and plants have declined severely, and some are on the brink of extinction. The USFS should develop specific conservation strategies for

imperiled species on the Black Hills National Forest in order to ensure viable and well distributed populations of these species. (Individual, Berkeley, CA – #23)

PC #: 164

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that implements conservation strategies for imperiled special status species.

The “Restoration Alternative” should ensure development of conservation strategies for individual sensitive species, management indicator species, threatened/endangered species and other vulnerable species of plants and animals (special status species) and their habitat. Given that many special status species’ populations and their habitats are not viable or well distributed, conservation strategies should include the recovery of current populations of special status species and their habitat. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 165

Public Concern: The Forest Plan Amendment should implement protective standards and guidelines to preserve species viability and biological diversity.

We hope the USFS will choose not to follow the same fatally misguided approach for managing species viability and diversity as it did for the 1997 Forest Plan and Phase I Amendment. There is no doubt this approach and implementation will face further legal challenges if carried out. Instead, we hope the USFS recognizes that, for many native species on the BHNF, the agency has failed to meet its legal and ethical viability and distribution requirement through past planning, including the Phase I Amendment. We hope the USFS implements the strongest and most protective management direction through the Phase II Amendment in order to meet and maintain biological diversity requirements for the BHNF. (Preservation/Conservation Organization, Boulder, CO – #32)

Management direction for the Phase II Amendment should be based on goals and objective for individual sensitive species, management indicator species, threatened and endangered species and other vulnerable species (special status species) and their habitat. . . . For all native and desired non-native species affected, the Phase II amendment must include goals, objectives, standards, guidelines and mitigation measures for protection and restoration of a sufficient quantity, quality, and distribution of specific habitat components or characteristics important to species survival, reproductive success, and ability to move and interact. (Preservation/Conservation Organization, Santa Fe, NM - #33)

PC #: 166

Public Concern: The Forest Plan Amendment should prioritize for maintenance of healthy native species populations.

The place of native species and their role in forest health, and the importance of forest health to their continued functions in the Forest, is important and often given less attention than rare or endangered species management. While the Endangered Species Act requires special management for species that are listed under the Act, some of these species are so rare that they no longer function as a factor in forest health. Maintaining natural processes, landscape / vegetative patterns, wildlife habitat, and healthy forests should help to prevent local extinction or critical declines in populations of common, native species. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 167

Public Concern: The Phase II Draft EIS should provide analysis of management impacts on an expansive list of terrestrial and avian species.

The Phase II Amendment should include an assessment and analysis of the potentially significant impacts on the following species: Northern Flying Squirrel, Least Chipmunk (subspecies *pallidus* and *silvaticus*), Yellow-bellied Marmot (subspecies *dacota*), Thirteen-lined Ground Squirrel, Red Squirrel, Northern Pocket Gopher, Olive-backed Pocket Mouse, Hispid Pocket Mouse, Ord’s Kangaroo Rat (subspecies *luteolus* and *terrosus*), Beaver, Western Harvest Mouse, White-footed Mouse, Deer Mouse, Bushy-tailed Woodrat, Red-backed Vole, Long-tailed Vole, Prairie Vole, Meadow Vole, Muskrat, River Otter, Meadow Jumping Mouse, Porcupine, Coyote, Red Fox, Raccoon, Ermine, Long-tailed Weasel, Mink, Badger, Striped Skunk, Bobcat, Mountain Lion, American Marten, Townsend’s Big-eared Bat, Fringe-tailed Myotis, Spotted Bat, Keen’s Myotis, Small-footed Myotis, Little Brown Myotis, Big Brown Bat, Long-legged Myotis, Silver-haired Bat, Red Bat, Hoary Bat, Dwarf Shrew, Masked Shrew, Swift Fox,

Black-tailed Prairie Dog, Black-footed Ferret, Black Bear, Bison, Desert Cottontail, Eastern Cottontail, Nuttall's Cottontail, White-tailed Jackrabbit. (Individual, Berkeley, CA – #23)

The following species should be included in the Phase II Amendment analysis and are of significant concern: Northern flying squirrel, Mountain lion, American marten, Townsend's Big-eared bat, Fringe-tailed myotis, Spotted bat, Dwarf shrew, Swift fox, Black-tailed prairie dog, Black-footed Ferret, Black Bear, Bison. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 168

Public Concern: The Forest Plan Amendment should implement a conservation strategy for the pine marten.

Conservation strategies should be developed for the American Marten. The Phase II Recommendations in the Expert Interview Summary for the American marten state that, "Since marten habitat relationships are not currently well defined, Ruggiero recommended the Forest ascertain the status of marten in the Black Hills rather than make assumptions." and to, "Develop a strategy to enhance connectivity in marten habitat." Given the adverse impacts of habitat fragmentation upon American marten and the lack of habitat relationship data, a conservation strategy must be developed specifically for the marten through the Phase II Amendment that provides management direction that increases connectivity of habitat and determines actual marten habitat relationships. This conservation strategy must include management direction recommendations made by Ruggiero and reiterated on pages 43 and 44 of the Expert Interview Summary. (Preservation/Conservation Organization, Boulder, CO – #32)

To provide for a viable, well distributed population of pine marten in the Black Hills, the Chief's interim direction should not be changed. The Phase II amendment should adopt the Chief's direction, word-for-word, for the marten and clarify that even ponderosa pine stands with little or no spruce should not be fragmented or suffer reduced patch size. This will also protect interior forest songbird populations (Crompton only observed the full complement of such birds in the Black Hills in unlogged patches larger than 1000 hectares). In addition, the Phase II amendment must include direction based on the expert interviews, such as the Phase I recommendations to "not build roads in potential marten habitat" and "not thin within connecting corridors." (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 169

Public Concern: The Forest Plan Amendment should implement a conservation strategy for Townsend's Big-eared Bat.

Conservation strategies should be developed for Townsend's Big-eared Bat. The Phase II Recommendations made in the Expert Interview Summary for the Townsend's Big-eared Bat recommends to, "Consider all standards in the Townsend's conservation strategy (Pierson et al. 1999) in developing a Forest strategy for maintaining viable populations." Given the imperiled status of other Townsend's Big-eared Bat populations, the Forest Service needs to develop a conservation strategy for this species. This strategy should include all Phase I and Phase II recommendations made in the Expert Interview Summary, as well as additional measures to ensure full protection of caves and abandoned mines. This should include designating as significant all caves that support or could potentially support the Townsend's Big-eared Bat and other bat species in accordance with the National Cave Resources Protection Act. This is especially necessary given that many caves have been severely abused by human activities and consequently cannot support bats. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 170

Public Concern: The Forest Plan Amendment should develop conservation strategies to restore black bears to the Black Hills.

Conservation strategies should be developed for the black bear. Through the Phase I Amendment, the black bear was arbitrarily removed from the MIS list as a result of a personal communication with Benson at the South Dakota Department of Game, Fish and Parks. Other than an internal citation on page 118 of the Phase I Amendment Environmental Assessment, there exists no further information that justifies the notion that the black bear does not exist on the Black Hills. Based on a personal account of wildlife biologist and Biodiversity Associates staff member, Erik Molvar, black bear still exist within the drainage of Middle Boxelder Creek. We request the USFS investigate this report and contact Mr. Molvar for further information. If the USFS has allowed black bear populations to diminish to the point of nonexistence, the agency is obligated to conduct a thorough status review of the bear on the

Black Hills and devise a conservation strategy for any remaining wild bears that may still be in existence that returns populations to viable numbers. We expect the Phase II environmental analysis to provide thorough scientific justification for any management direction proposed to restore viable and well-distributed populations of black bear. Additionally, the USFS should be working very closely with the South Dakota Department of Game, Fish and Parks in order to restore populations of this South Dakota threatened species back to the Black Hills, probably one of the only areas of suitable habitat that remain in South Dakota. A conservation strategy for the black bear should identify management direction for its habitat and any remaining populations that may be identified through an extensive survey. (Preservation/Conservation Organization, Boulder, CO – #32)

Re-introduce black bears – there's tons of good bear habitat in the Black Hills! (Individual, Woodland Park, CO – #22)

The Forest Service needs to conduct a thorough analysis of the status of the black bear on the Black Hills National Forest. The Forest Service is obligated to manage for viable and well-distributed populations of black bear. A conservation strategy should be developed, in cooperation with the South Dakota Department of Game, Fish and Parks to rescue the black bear from near-extirpation on the Black Hills. (Preservation/Conservation Organization, Santa Fe, NM – #33)

The Forest Service is proposing to delete the black bear from the MIS list based on the assertion this species has been extirpated from the Forest. There have been recent sightings of black bear (with cubs) in the Black Hills. Regardless of these sightings, the Phase II amendment should provide direction to restore this species to the Forest and designate it as a Black Hills Sensitive Species. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 171

Public Concern: The Forest Plan Amendment should implement a conservation strategy for the black-tailed prairie dog.

Conservation strategies should be developed for the black-tailed prairie dog. The black-tailed prairie dog is warranted (but precluded) for listing under the ESA at this time due to the fact that this animal's population is distributed within less than 1% of its historical range and is further threatened by poisoning, shooting, plague, conversion of prairie to crops and other developments. The determination, made by the United States Fish and Wildlife Service, suggests that, unless prairie dog populations increase dramatically, this animal will be listed under the ESA some time in the future. Most recently however, the State of Wyoming refused to implement a plan to recover populations of black-tailed prairie dog, further imperiling the animal by providing no management direction for some of the best remaining black-tailed prairie dog colonies and habitat. Accordingly, the U.S. Fish and Wildlife Service may be revisiting the need to list this animal as soon as possible due to the significant lack of commitment toward recovery displayed by State governments. In order to meet ESA requirements and ensure future recovery of the black-tailed prairie dog, the USFS must develop a black-tailed prairie dog conservation strategy for the Black Hills through the Phase II Amendment. This strategy should not only fully protect known prairie dog colonies from shooting, livestock grazing and other adverse impacts, but also protect potential prairie dog habitat in order to ensure populations of this imperiled species can be restored on the Black Hills. We request the USFS, in devising a black-tailed prairie dog conservation strategy, to formally consult with the U.S. Fish and Wildlife Service to determine prairie dog habitat needs and population goals, and implement the strongest protections for this species to ensure these requirements are met. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 172

Public Concern: The Forest Plan Amendment should implement a conservation strategy for the Northern flying squirrel.

Conservation strategies should be developed for the Northern flying squirrel. The 1997 Forest Plan EIS states on page III-332 that, "Minimum viable population requirements are estimated in the HABCAP documentation to be 10 individuals." We find this number to be far from a viable population (given this means, at best, 5 breeding pairs). While no population data is currently available for this species, it seem safe to assume that, given a severe lack of this species' preferred old growth on the BHNF – especially ponderosa pine old growth – and the fact that this species is primarily found in the northern Black Hills, there is reason to believe the continued existence of the northern flying squirrel on the BHNF is threatened. The Phase I Amendment assumed that goshawk protection measures would be adequate to protect this species, with no analysis that supported this assertion. Since northern goshawk need late successional ponderosa pine habitat as nesting and for a majority of PFA habitat, it seems

reasonable to assume the northern flying squirrel's preferred spruce habitat is not protected through goshawk protection measures. A conservation strategy for this species needs to be developed through the Phase II Amendment. This strategy must include forest-wide analysis of this species numbers and habitat and a thorough analysis of population and habitat trends. A conservation strategy for the northern flying squirrel is necessary to ensure this species' viability on the BHNF and to provide management direction that specifically addresses this little known mammal. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 173

Public Concern: The Forest Plan Amendment should provide standards, guidelines and mitigation measures to preserve the entire biological community.

Forest Plan Revisions and the FEISs accompanying these revisions must prescribe goals, objectives, standards, guidelines, and mitigation measures that provide for the viability of the entire biological community, and not just a subset of species, and . . . that are based upon protection and restoration of a sufficient quantity, quality, and distribution of specific habitat components or characteristics important to species survival, reproductive success, and ability to move and interact. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 174

Public Concern: The Black Hills National Forest should monitor changes in wildlife populations and habitat.

Forest Plan Revisions and the FEISs accompanying these revisions must . . . include credible monitoring strategies that track changes in habitat quantity, quality, and distribution, changes in populations and the relationship between changes in habitat and populations caused by management activities. (Preservation/Conservation Organization, Santa Fe, NM – #33)

Monitoring and evaluation plans must establish credible monitoring protocols to track changes in wildlife, fish, or plant populations and their habitats. Monitoring plans require tracking of changes in habitat resulting from natural disturbance and forest management activities. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 175

Public Concern: The Phase II Draft EIS should analyze management impacts on birds.

The Phase II Amendment should include an assessment and analysis of the potentially significant impacts on the following species: Northern Goshawk, Black-backed Woodpecker, Three-toed Woodpecker, Hairy Woodpecker, Downy Woodpecker, Common Flicker, Lewis's Woodpecker, Fox Sparrow, Dark-eyed Junco, Golden-crowned Kinglet, Loggerhead shrike, Merlin, Olive-sided Flycatcher, Osprey, Purple Martin, Pygmy Nuthatch, Red-breasted Nuthatch, Upland Sandpiper, Brown Creeper, Ovenbird, Red-naped Sapsucker, American Dipper, Townsend's Solitaire, Bald Eagle, Peregrine Falcon, Prairie Falcon, Red-tailed Hawk, Golden Eagle, Cooper's Hawk, Sharp-shinned Hawk, Ferruginous Hawk, Burrowing Owl, Great Horned Owl, Northern Saw-whet Owl, Turkey Vulture, Sharp-tailed Grouse. (Individual, Berkeley, CA – #23)

PC #: 176

Public Concern: The Forest Plan Amendment should enforce statutory protection of migratory bird species.

Please recognize that consultation on listed species may not remove your obligation to protect the many species of migratory birds, including eagles and other raptors protected under the Migratory Bird Treaty Act (MBTA) and Bald and Golden Eagle Protection Act (BGEPA). The MBTA, 16 U.S.C. 703, enacted in 1918, prohibits the taking of any migratory birds, their parts, nests, or eggs except as permitted by regulations and does not require intent to be proven. Section 703 of the Act states, "Unless and except as permitted by regulations . . . it shall be unlawful at any time, by any means or in any manner, to . . . take, capture, kill, attempt to take, capture, or kill or possess . . . any migratory bird, any part, nest, or eggs of any such bird. . . ." The BGEPA, 16 U.S.C 668, prohibits knowingly taking, or taking with wanton disregard for the consequences of any activity, any bald or golden eagles or their body parts, nests, or eggs, which includes collection, molestation, or killing. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 177

Public Concern: The Phase II Draft EIS should analyze management impacts on reptile and amphibian species.

The Phase II Amendment should include an assessment and analysis of the potentially significant impacts on the following species: Leopard Frog, Woodhouse's Toad, Plain's Spadefoot, Tiger Salamander, Black Hills Red-Bellied Snake, Milk Snake. (Individual, Berkeley, CA – #23)

PC #: 178

Public Concern: The Forest Plan Amendment should implement strategies to preserve native fish species.

The Phase II amendment must provide direction for maintaining the viability and improving the distribution of imperiled native fish on the Forest. Of particular concern is the lake chub which was formerly common in streams of the Black Hills but is now limited to Deerfield reservoir and perhaps only one nearby stream (in the vicinity of McIntosh Fen). This population is neither viable nor well-distributed. The finescale dace and mountain sucker are also in need of better management direction. Designating these species as MIS is not enough; strong new management direction (with restrictions on land uses and water development, etc.) is needed in the Phase II amendment. (Preservation/Conservation Organization, Rapid City, SD – #8)

Conservation strategies should be developed for . . . native fish species. The current status of native fish species on the Black Hills, although nearly undocumented by past analysis, is severely threatened. Water developments (e.g. reservoirs, diversions, etc.), introduction of non-native aquatic species, roads and overfishing have all led to the imperilment of these species. In response, the Phase II Amendment should ensure recovery of native fish species by developing a native fish conservation strategy. This conservation strategy must fully assess the current and historical populations of native fish species, fully analyze and assess the impacts of non-native fish species on native fish, develop population and distribution goals for recovery, ensure that native fish species populations are fully recovered and viable in all suitable habitats, and ensure that the adverse impacts of non-native fish species on native fish species are effectively mitigated to ensure recovery. The conservation strategy should also identify those waters which have or may have suitable habitat and designate these stream reaches as native fish water bodies and implement the strongest possible protections to ensure these streams remain supportive of native fish populations. Management activities that inhibit native fish recovery should be disallowed within or around suitable habitat (i.e. the watershed). If non-native fish species are found to inhibit native fish recovery, non-native species should be removed and environmentally protective barriers placed within suitable streams in order to prevent non-native fish from migrating into native fish waters. Barriers should be placed so as to not inhibit general migration habitats of native fish and to not inhibit migration into recovery waters. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 179

Public Concern: The Phase II DEIS should analyze management impacts on native fish species.

The Phase II Amendment should include an assessment and analysis of the potentially significant impacts on the following species: Mountain Sucker, Finescale Dace, Lake Chub, Longnose Sucker, Creek Chub, Fathead Minnow, Longnosed Dace. (Individual, Berkeley, CA – #23)

PC #: 180

Public Concern: The Phase II Draft EIS should consider the impacts of management activities on species outside of the planning area.

The preliminary issues appear to just be looking at the impact that species diversity management might be having on local economies and other resource users. The actions on the forest should also consider possible impacts to native and introduced species off the forest, specifically the associated forest activities on Sand Creek (whose major springs re-appear just off the forest). (Wyoming Game and Fish Department, Cheyenne, WY – #55)

PC #: 181

Public Concern: The Forest Plan Amendment should provide protection for colonies of land snails identified to be of special concern.

The Phase II amendment must provide strong direction to protect all known or suspected colonies of land snails of special concern (there are 7 varieties of land snail that have been identified by Frest and Johannes – who, by the way, were not interviewed by the USFS and who have stated that these snails should be listed as threatened or endangered species). Some of these rare snails (e.g., Pahasapa Mountainsnail) are believed to occur nowhere else in the world. The Phase II amendment must therefore adopt direction prohibiting livestock grazing, logging, road construction, prescribed fire, use of chemicals (e.g., dust palliative, pesticides, insecticides, etc.), and other ground-disturbing activities within 100-200 meters of known or suspected colonies of snails of special concern on the Black Hills. Road building and other activities must not be allowed if they dry up springs or seeps, or otherwise result in a hotter, drier microclimate in a snail colony of concern. Phase II must also require thorough inventories for land snails in project areas before ground-disturbing activities are allowed. (Preservation/Conservation Organization, Rapid City, SD – #8)

Conservation strategies should be developed for the following imperiled species: Snail Species of Concern (as identified in Frest 1993 and Frest 2001). A conservation strategy based on the 1993 Frest report and the 2001 Frest report in preparation identified in the Phase I Amendment (specifically Standard 3103) and the recommendations therein needs to be developed to protect snail species of concern through the Phase II Amendment. The Phase I Amendment provides no specific direction or protection for snail species of concern and this must be remedied through the Phase II Amendment. This conservation strategy should ensure all known colonies of snail species of concern are protected, as well as potential snail species of concern habitat with large buffers and restrictions on aquatic (e.g. stream, riparian, spring) developments and activities that indirectly affect snail habitat; and should develop population and habitat goals that should be met as soon as possible in order to ensure viable and well-distributed populations of these species. Additionally, all snail species of concern should be designated as sensitive species to fully protect these species from management activities and to ensure populations are not listed under the Endangered Species Act. This conservation strategy must ensure populations and habitats of all snail species of concern increase forest-wide. We request the USFS consult extensively with Frest and Johannes in order to devise an adequate conservation strategy and conduct an expert interview with Frest and Johannes for the purposes of the Phase II Amendment. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 182

Public Concern: The Phase II Draft EIS should analyze impacts on an expansive list of invertebrates.

In the Phase II Amendment environmental analysis, we request the USFS include an assessment and analysis of the potentially significant impacts on the following species: Regal Fritillary Butterfly, Tawny Crescent, Cooper's Rocky Mountain Snail, Striate Disc, *Vertigo arthuri*, *Vertigo paradoxa*, *Catinella gelida*, *Oreohelix strigosa n. subspp.*, *Oreohelix strigosa berryi*, all species of Ephemeroptera and Plecoptera. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 183

Public Concern: The Forest Plan Amendment should establish all environmentally protective guidelines as standards.

The Chief's Forest Plan appeal ruling requires the Black Hills to "Treat all environmentally protective guidelines in the Revised Plan as standards unless doing so would conflict with other interim direction." The Chief's Interim Direction was not limited just to those guidelines that are "related to species viability." The Phase II amendment must treat all guidelines that affect wildlife habitat as "standards." (Preservation/Conservation Organization, Rapid City, SD – #8)

We highly applaud BHNF's efforts in Phase I to now treat all environmentally protective guidelines relative to sensitive wildlife and plant populations and habitats as standards (Phase I Appendix 5). We support continuation of this change. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 184

Public Concern: The Phase II Draft EIS should provide a comprehensive analysis of cumulative effects on wildlife.

We believe the document should address: the cumulative effects of past projects, proposed and approved future projects on diversity, stability, fragmentation, connectivity with adjacent landscapes, and disruption to processes or functions. (U.S. Environmental Protection Agency, Denver, CO – #60)

There is no question that, since the advent of European settlement of the Black Hills, the Black Hills National Forest has undergone immense transformation. . . . The Phase II Amendment must include a complete and thorough cumulative effects analysis. The minimum requirements for analysis and mitigation of cumulative impacts have been extensively described by the Council on Environmental Quality . . . and by the Forest Service's Environmental Policy and Procedures Handbook (FSH 1909.15.15.1). . . . At minimum, an adequate cumulative effects analysis must: (1) identify the past, present, and reasonably foreseeable actions of Forest Service and other parties affecting each particular aspect of the affected environment; (2) must provide quantitative information regarding past changes in habitat quality and quantity, water quality, resource values, and other aspects of the affected environment that are likely to be altered by Forest Service actions; (3) must estimate incremental changes in these conditions that will result from Forest Service actions in combination with actions of other parties, including synergistic effects; (4) must identify any critical thresholds of environmental concern that may be exceeded by Forest Service actions in combination with actions of other parties, and; (5) must identify specific mitigation measures that will be implemented to reduce or eliminate such effects. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 185

Public Concern: The Phase II Draft EIS should reassess HABCAP modeling to determine minimum hiding cover.

We would like to discuss with BBNF why the Revised Plan deleted the 40% hiding cover requirement and heavily relies upon the HABCAP models to provide minimum hiding cover. We support use of models as one tool for better wildlife management but models should be used in concert with other scientific principles and wildlife biologists' expertise. We feel the HABCAP models need further validation and we welcome an opportunity to assist. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

Management Indicator Species

PC #: 186

Public Concern: The Phase II Draft EIS should include a Restoration Alternative that designates plant and invertebrate Management Indicator Species, new habitat component indicators, and non-fish aquatic Management Indicator Species.

The "Restoration Alternative" should ensure designation of aquatic MIS other than fish and designate plant and invertebrate MIS, as well as new habitat component indicators. The MIS list should be reanalyzed and modified and new species added or removed if found appropriate. Monitoring should ensure management activities do not adversely impact MIS populations or their habitat. (Preservation/Conservation Organization, Boulder, CO – #32)

The non-commercial, restoration-only alternative should be based on the following principles: designating aquatic management indicator species (ecological health indicators) other than fish and designating plant and invertebrate MIS. (Preservation/Conservation Organization, Santa Fe, NM – #33)

PC #: 187

Public Concern: The Forest Plan Amendment should reexamine criteria for Management Indicator Species designation.

The Chief noted many severe deficiencies within the 1997 Forest Plan concerning MIS that need to be corrected through the Phase II Amendment. Accordingly, we request the USFS completely revisit MIS analysis and MIS management direction through the Phase II Amendment and analysis, in accordance with the Chief's ruling and with NFMA regulations. The Phase II Amendment must do the following to meet USFS MIS management requirements:

create a new MIS and habitat list with a detailed explanation, backed with consistent and up-to-date scientific data and observations, as to why each species was selected. (Preservation/Conservation Organization, Boulder, CO – #32)

While Phase I made some changes to MIS, Game, Fish and Parks would like the opportunity to meet with BHNF to discuss the feasibility and appropriateness of adding ruffed grouse, sharp-tailed grouse, meadow jumping mouse, bat species, beaver and American dipper and re-evaluating the inclusion of some non-native species such as brown trout. These suggestions are by no means complete. With the completion of the BH Natural Community Inventory, there should be specific plant associations that warrant re-evaluation such as montane grasslands. Please contact us to set up a time to discuss MIS. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 188

Public Concern: The Forest Plan Amendment MIS list should include non-fish aquatic species.

We support the Forest Service's proposal to designate the five fish species (lake chub, finescale dace, brown trout, and mountain sucker) as aquatic Management Indicator Species (MIS). Through the Phase II amendment, however, the Forest must also designate non-fish leopard frog, tiger salamander, beaver, dipper, willow communities, and aquatic plants that may indicate other effects of management activities (including livestock grazing, water development/depletion, mining, water quality and fishing). (Preservation/Conservation Organization, Rapid City, SD – #8)

We request the USFS add the following species and habitats and make modifications to the current MIS list: aquatic indicator species other than fish should be designated in order to ensure riparian and stream health. Aquatic macroinvertebrate (e.g. stoneflies and mayflies or species Ephemeroptera and Plecoptera), the Northern leopard frog, tiger salamander, beaver, dipper, willow communities, and aquatic plants should be designated as MIS. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 189

Public Concern: The Forest Plan Amendment MIS list should include the mountain lion.

Since the health of large predator populations provides information about activities on the Forest, the Phase II amendment should designate the mountain lion (which does currently exist in the Forest) as an MIS and Sensitive Species on the Black Hills. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 190

Public Concern: The Forest Plan Amendment MIS list should include the ovenbird and redefine its indicator habitat.

We request the USFS add the following species and habitats and make modifications to the current MIS list: Ovenbird. The ovenbird is an indicator of early quaking aspen seral stage health according to Appendix L of the 1997 Forest Plan. However, page III-335 of the 1997 Forest Plan EIS states, "Crompton (1994) found these birds only in untreated conifer/aspen stands with a dense understory of deciduous vegetation. He felt that conifer overstory component was an important factor and conifer removal would result in species declines." Accordingly, the ovenbird should be an indicator of conifer/aspen stand health, rather than early quaking aspen seral stage health. This habitat should be included in the MIS list and the ovenbird designated an indicator of health. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 191

Public Concern: The Forest Plan Amendment MIS list should include the Northern Flying Squirrel.

We request the USFS add the following species and habitats and make modifications to the current MIS list: the Northern Flying Squirrel, an indicator of late-succession white spruce and mixed late-succession white spruce/ponderosa pine, should be designated. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 192

Public Concern: The Forest Plan Amendment MIS list should include the black bear.

The Black Bear should be re-added to the MIS list as there is no real confirmation that this species is extirpated in the Black Hills and it remains a species of concern. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 193

Public Concern: The Forest Plan Amendment MIS list should include the black-tailed prairie dog.

The Black-tailed prairie dog should be designated an MIS to indicate prairie and grassland ecosystem health. This is especially important given the keystone ecological status of the prairie dog. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 194

Public Concern: The Forest Plan Amendment MIS list should include snag indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: Species that are indicative of forest-wide snag health should be designated. The species designated as MIS should be representative of soft and hard-snag densities, as well as primary and secondary cavity nesting species. These species should include, but not be limited to: the Lewis's woodpecker (indicative of soft-snag habitat); black-backed woodpecker; Northern flicker; Pygmy nuthatch, Olive-sided flycatcher; Red-breasted nuthatch; Saw-whet Owl; Northern Flying Squirrel; and Sensitive bat species. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 195

Public Concern: The Forest Plan Amendment MIS list should include downed woody debris indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: downed woody debris indicator species. Species that are indicative of forest-wide downed woody debris should be designated. These species should include, but not be limited to: American marten; tiger salamander or other amphibians; red-backed vole; Black Hills red-bellied snake; and sensitive snail species. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 196

Public Concern: The Forest Plan Amendment MIS list should include montane grassland indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: montane grasslands indicator species. Vegetation species associated with imperiled montane grasslands should be used as indicators of montane grassland health. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 197

Public Concern: The Forest Plan Amendment MIS list should include post-fire indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: post-fire indicator species. Species associated with post-fire environments should be designated in order to determine the impacts of post-fire management activities. These species should include, but not be limited to: Lewis's woodpecker; Black-backed woodpecker; and native grass and forb species that are sensitive to noxious weed proliferation. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 198

Public Concern: The Forest Plan Amendment MIS list should include insect outbreak indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: insect outbreak indicator species. Populations of insectivorous species of wildlife may be excellent indicators of natural forest health as their viability and distribution effectively indicates insect outbreaks. The greater the populations of these wildlife species, the greater the possibility of the forest naturally and effectively limiting the spread and magnitude of insect outbreaks. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 199

Public Concern: The Forest Plan Amendment MIS list should include Best Management Practice indicator species.

We request the USFS add the following species and habitats and make modifications to the current MIS list: Best Management Practice (“BMP”) indicator species. To further determine the effectiveness of BMPs, aquatic indicator species should be designated to further indicate whether BMPs are effective. The USFS, rather than the State of South Dakota or Wyoming should be responsible for monitoring the effectiveness of BMPs in order to fully minimize the impacts of road construction on water resources in the BBNF. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 200

Public Concern: The Forest Plan Amendment MIS list should include water quality indicator species appropriate for each water body and stream type.

Water quality and instream fisheries habitat should be further classified and monitored according to South Dakota and Wyoming State Water Quality Laws. Accordingly, the most protective beneficial use associated with each stream and water body should be the basis for habitat indicators and monitoring species should be designated to indicate whether or not a water body is meeting water quality requirements. For example, a water designated as permanent cold water fish habitat should be monitored using cold water, native aquatic species such as the mountain sucker and aquatic invertebrates. Additionally, timing and quality of monitoring should also be based upon whether a water body is listed or proposed for listing on the South Dakota or Wyoming Total Maximum Daily Load (“TMDL”) lists (e.g. impaired water bodies should be monitored more frequently and thoroughly than other water bodies). (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 201

Public Concern: The Forest Plan Amendment MIS list should include mixed habitat indicator communities.

We request the USFS add the following species and habitats and make modifications to the current MIS list: Mixed habitat components, such as deciduous/pine and pine/spruce communities, should be included as indicators given that many species are dependent on mixed habitats. Species such as the American marten (Spruce/Ponderosa Pine), Northern flying squirrel (Spruce/Ponderosa Pine) and Ovenbird (Deciduous/Ponderosa Pine) should be designated to indicate the health of mixed habitat components. Additionally, vegetation communities listed in the 2000 Black Hills Community Inventory Report by the Nature Conservancy should also be used as habitat component indicators. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 202

Public Concern: The Forest Plan Amendment MIS list should include plant species associated with riparian areas.

To further indicate and monitor riparian health, plant species associated with healthy riparian areas should be designated as MIS. These species should include willow communities and other aquatic plants. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 203

Public Concern: The Forest Plan Amendment should require consideration of all present Management Indicator Species in subsequent project analyses.

In accordance with the Chief's Appeal Ruling and the plain language of the regulations, the Phase II Amendment must . . . provide management direction that ensures that all MIS that may occur in the project area are included in all project-level analyses. The Chief noted that current MIS management direction failed to ensure that all MIS that may occur in the project area are included in all project-level analyses. Although we fully support the inclusion of new MIS at the project level throughout the implementation of the Phase II Amendment, the Amendment should not allow certain species to be removed or substituted in project-level analyses. This is necessary to ensure that MIS are not excluded from analysis. Additionally, if new species are included, the USFS should provide adequate reasoning that supports their inclusion into project-level analysis. This reasoning should include a species' relation to the affected environment, habitat needs, population trends, habitat trends and management goals for a species' population and habitat. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 204

Public Concern: The Forest Plan Amendment MIS list should include population and habitat management goals for each species.

In accordance with the Chief's Appeal Ruling and the plain language of the regulations, the Phase II Amendment must . . . devise MIS-specific population and habitat management goals for each MIS. . . . The USFS should not assume that current populations are viable or well distributed when conducting MIS analysis or formulating goals and management objectives for MIS populations and their habitats. Additionally, in order to adequately monitor MIS populations and their habitat and ensure management activities do not negatively impact ecosystem health, population and habitat management goals should require no adverse impacts to MIS populations or their habitats. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 205

Public Concern: The Phase II Draft EIS should analyze impacts of proposed management on habitat quality for Management Indicator Species.

In accordance with the Chief's Appeal Ruling and the plain language of the regulations, the Phase II Amendment must do the following to meet USFS MIS management requirements: present the potentially significant impacts of the Phase II Amendment upon MIS in terms of quality of habitat and animal population trends of MIS in accordance with 36 CFR section 219.19(a)(2). Quality of habitat should not be based solely on habitat capability analysis; rather, habitat quality should be determined through on the ground observations that take into consideration the cumulative impacts upon habitat quality. The Phase II Amendment should ensure no significant impacts upon MIS populations and their habitat. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 206

Public Concern: The Forest Plan Amendment should develop monitoring and evaluation strategies for Management Indicator Species.

In accordance with the Chief's Appeal Ruling and the plain language of the regulations, the Phase II Amendment must . . . develop new monitoring and evaluation strategies for individual MIS that ensures compliance with 36 CFR section 219.19(a)(6). A legally sufficient and biologically appropriate monitoring plan will include a wide range of monitoring protocols designed to detect any significant changes in key habitat characteristics or species status. It will delineate specific monitoring methods or approaches that guarantee sufficient accuracy and precision. It will ensure that monitoring for each factor is of sufficient frequency that significant changes in environmental conditions are detected early enough that the USFS can alter management activities accordingly. It must also include specific thresholds, the breach of which triggers a cessation of the management activities thought to be causing the impacts and a reassessment of the practice so that adverse impacts will be avoided. This is the essence of adaptive management: a feedback system ensuring that problems are detected early enough so that corrective actions can be taken. To really be adaptive, the Phase II Amendment monitoring program must be able to identify downward trends in native species, ecosystems, and natural resources, and the Amendment must ensure that appropriate adjustments occur expeditiously. (Preservation/Conservation Organization, Boulder, CO – #32)

BHNF has diligently worked on gathering expert opinions and conservation assessments of various sensitive and Management Indicator Species for the Plan Amendment. Through those efforts, we hope that the Forest will learn sufficient information to develop monitoring requirements as per 36 CFR 219.12.12(k) and conservation strategies. This will be a monumental task and we offer any assistance in developing monitoring criteria. Monitoring and evaluation are critical components of any valid Forest Plan and we support adequate funding and manpower. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

Threatened, Endangered, and Sensitive Wildlife Species

PC #: 207

Public Concern: The Phase II Draft EIS should analyze the population and habitat of Mountain plover.

In accordance with section 7(c) of the Endangered Species Act of 1973, as amended (Act), my staff has determined that . . . threatened or endangered species, or species proposed for listing under the Act, may be present within the Black Hills National Forest [including the Mountain plover]. Because of the existing black-tailed Prairie dog habitat found on the forest, and the growing concern regarding the status of mountain plovers in Wyoming, we recommend you consider the proposed Mountain plover in your wildlife analysis. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 208

Public Concern: The Forest Plan Amendment should require surveys for Mountain plover and subsequent avoidance of nesting sites.

The Service recommends surveys for mountain plovers in all suitable habitat as well as avoidance of nesting areas to minimize impact to plovers in a site planned for development or disturbance. In some cases, activities can be conducted between August 15th and March 15th to avoid affecting this species. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 209

Public Concern: The Phase II Draft EIS should analyze the impacts of proposed management actions on threatened, endangered and sensitive species.

We believe the document should address: the presence of threatened, endangered or sensitive species; communities that are at the edge of their range; or the identification of “gap” habitats. (U.S. Environmental Protection Agency, Denver, CO – #60)

Both the Biological Assessment and the EIS must disclose and evaluate the potential impacts of the proposed action on species listed under the ESA. The full disclosure mandate of NEPA suggests that the consultation be instigated as soon as possible. Thus, the final EIS and Record of Decision should not be completed prior to completion of ESA consultation. Integrating the consultation process with the NEPA process assures that the U.S. Fish and Wildlife Service can identify additional impacts, new mitigation measures, or changes to the preferred alternative during the NEPA process and can help to avoid a jeopardy opinion or other unforeseeable problems such as revisions to the DEIS or FEIS. (U.S. Environmental Protection Agency, Denver, CO – #60)

GRAY WOLF

All wolves within Wyoming are now considered part of the nonessential experimental population. Although such wolves remain listed and protected under the [ESA] Act, additional flexibility is provided for their management under the provisions of the final rule and special regulations promulgated for the nonessential experimental population on November 22, 1994 (59 FR 60252). Requirements for interagency consultation under section 7 of the Act differ based on the surface ownership and/or management responsibility where the animals occur. Two provisions of section 7 apply to Federal actions outside National Parks or National Refuges: (1) section 7(a)(1), which states all Federal agencies shall utilize their authorities to carry out programs for the conservation of listed species; and (2) section 7(a)(4), which requires Federal agencies to confer informally with the Service on actions that are likely to jeopardize the continued existence of the species. Under all management jurisdictions, the action agency needs to assess the potential impact of any proposed action on the gray wolf. The Service recommends that

Federal Agencies analyze impacts on nonessential populations, along with other populations of fish and wildlife, when complying with the requirements of the National Environmental Policy Act. Any protective measures in addition to those outlined in the final rule or additional review procedures, are at the discretion of the Federal Action Agency. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

BLACK-TAILED PRAIRIE DOG

Species that are candidates for listing as threatened or endangered that occur within the Black Hills National Forest [include the black-tailed prairie dog]. Many Federal agencies have policies to protect candidate species from further population declines. We appreciate your inclusion of black-tailed prairie dog information in the 1997 Land and Resource Management Plan Environmental Assessment, Phase I Amendment (2001) document, and encourage its inclusion in any Phase II Amendment documents. Should this species be proposed for listing, and the lead Federal agency would be required to confer with this office if that agency determines their action (e.g. approval of the project) is likely to jeopardize the continued existence of any of these species. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 210

Public Concern: The Phase II Draft EIS should include the Phase I analysis of the bald eagle and black-footed ferret.

In accordance with section 7(c) of the Endangered Species Act of 1973, as amended (Act), my staff has determined that . . . threatened or endangered species, or species proposed for listing under the Act, may be present within the Black Hills National Forest [including the bald eagle and black-footed ferret]. The bald eagle and black-footed ferret are adequately addressed in the Phase I Amendment of 2001. While the Fish and Wildlife Service has no further concerns regarding the bald eagle or black-footed ferret, the Phase I discussion should be included in the Phase II Amendment. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 211

Public Concern: The Black Hills National Forest should consult with the U.S. Fish and Wildlife Service regarding potential impacts on species listed under the Endangered Species Act.

Section 7(c) of [the Endangered Species] Act requires that a biological assessment be prepared for any Federal action that is a major construction activity to determine the effects of the proposed action on listed and proposed species. If a biological assessment is not required (i.e., all other actions), the lead Federal agency is responsible for review of proposed activities to determine whether listed species will be affected. We would appreciate the opportunity to review any such determination document. If it is determined that the proposed activities may affect a listed species, you should contact this office to discuss consultation requirements. If it is determined that any Federal agency program or project “is likely to adversely affect” any listed species, formal consultation should be initiated with this office. Alternatively, informal consultation can be continued so we can work together to determine how the project could be modified to reduce impacts to listed species to the “not likely to adversely affect” threshold. If it is concluded that the project “is not likely to adversely affect” listed species, we should be asked to review the assessment and concur with the determination of not likely to adversely affect. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PRIOR TO COMMITMENT OF RESOURCES

Section 7(d) of the Act requires that the Federal agency and permit or license applicant shall not make any irreversible or irretrievable commitment of resources which would preclude the formulation of reasonable and prudent alternatives until consultation on listed species is completed. We will work with the lead Federal agency in the section 7 consultation process. The analysis of project impacts must assess direct impacts of the project, as well as those impacts that are interrelated to or interdependent with the proposed action. Impacts to listed species on non-Federal lands must be evaluated along with such impacts on Federal lands. Any measures that are ultimately required to avoid or reduce impacts to listed species will apply to Federal as well as non-Federal lands. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 212

Public Concern: The Black Hills National Forest should follow U.S. Fish and Wildlife Service recommendations for completion of Endangered Species Act biological assessments.

For those actions where a biological assessment is necessary, it should be completed within 180 days of receipt of a species list, but can be extended by mutual agreement between the lead agency and the Service. If the assessment is not initiated within 90 days of receipt of a species list, the list of threatened and endangered species should be verified with me prior to initiation of the assessment. The biological assessment may be undertaken as part of the agency's compliance of section 102 of the National Environmental Policy Act (NEPA), and incorporated into the NEPA documents. The Service recommends that biological assessments include [particular elements outlined in our letter]. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 213

Public Concern: The Black Hills National Forest must determine whether any proposed action may jeopardize species proposed for the Endangered Species Act.

Regarding species proposed for listing, Federal agencies must determine whether any of their proposed activities are likely to jeopardize the continued existence of the species. If jeopardy is likely, that agency must confer with the Fish and Wildlife Service. (U.S. Fish and Wildlife Service, Cheyenne, WY – #34)

PC #: 214

Public Concern: The Phase II Draft EIS should include a Restoration Alternative with conservation strategies for each threatened, endangered, sensitive and vulnerable plant and wildlife species.

Within this Restoration Alternative, to sum up, I implore your agency to . . . devise and implement conservation strategies for all individual "sensitive species" and their habitat, and for other vulnerable plants and wildlife on the Forest. (Individual, Portland, OR – #31)

PC #: 215

Public Concern: The Forest Plan Amendment should include a conservation strategy protecting the northern goshawk and its habitat.

Conservation strategies should be developed for the . . . Northern goshawk. Experts recommended the USFS develop a conservation strategy for the northern Goshawk using the same process used to develop the Southwest goshawk guidelines in order to develop management direction for the goshawk specific to the Black Hills ecosystem (see Expert Interview Summary p. 81). This conservation strategy must include management direction across the landscape in order to ensure protection of known and unknown nest, post-fledging family area (PFA) and foraging habitat. Landscape protection should be based on historically or presently active goshawk territories and on protecting all suitable habitat. Additionally, management direction should be developed according to the specific habitat needs of the goshawk on the Black Hills. This should include a determination of the balance of vegetation structural stages necessary to maintain goshawk PFA and foraging habitat and the specific and preferred sizes of nesting, PFA and foraging territories on the Black Hills. Management direction should emphasize providing high quality and quantity nesting habitat, rather than emphasizing prey management, since nesting habitat is the primary factor limiting goshawk viability on the Black Hills. (Preservation/Conservation Organization, Boulder, CO – #32)

A conservation strategy and management direction for the Northern goshawk should be developed for the Black Hills – similar to (though stronger than) that developed for the Southwest – in order to ensure viability of this imperiled forest raptor. (Individual, Portland, OR – #31)

PC #: 216

Public Concern: The Forest Plan Amendment should protect additional northern goshawk habitat.

The Jasper Fire burned nearly 10% of the Forest, including a significant percentage of the known goshawk habitat and nest stands on the Black Hills. The goshawk population on the Forest before the Jasper Fire—consisting of possibly fewer than 10 and certainly no more than 25 goshawk pairs—is already below the “viable, well-distributed” threshold. The Chief of the Forest Service has agreed this is the case in his ruling on our appeal of the BHNF Revised Forest Plan. Because the goshawk population in the Black Hills was neither viable nor well distributed before the Jasper Fire, it is even less so now, and any further loss or degradation of goshawk habitat is clearly unlawful. Because the Jasper fire eliminated about 5,000 acres of nesting and PFA habitat and burned 9 of the 10 known goshawk nest territories across a significant portion of the Forest, the viability issue must be addressed before any further loss of goshawk habitat can even be considered, much less authorized. At a minimum, the Forest should set aside high quality goshawk habitat elsewhere on the Forest to offset the loss of goshawk habitat from the fire and proposed salvage logging. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 217

Public Concern: The Forest Plan Amendment should include a strengthened version of Region 3 goshawk guidelines.

For the Black Hills, it is inappropriate to use the goshawk management guidelines developed for the Southwest United States (Region 3) for three reasons. First, the Black Hills is subject to much harsher weather than the southwest region, so nest stands and post fledging areas (PFAs) should contain greater percentages and larger patches of mature dense forest habitat to help provide thermal protection for young birds. Second, the BHNF has adopted a completely inadequate tree size classification scheme, in which all trees larger than 8” DBH are lumped into SIS-4. Large trees needed for goshawk nesting and PFA areas would grow to 20-30” dbh. These large-diameter trees are tracked much more adequately by the SW guidelines, which use a larger number of tree-diameter classes. Those SW guidelines should be converted to percentages of trees in each size-class, which would then make it starkly clear that goshawk habitat on the BHNF must be left undisturbed in order to move towards these larger diameter tree sizes as quickly as possible, while maintaining existing large trees to the greatest extent. Left unlogged, ponderosa pine on the Black Hills will routinely grow to 30” dbh. And third, the SW guidelines were largely based on the assumption that goshawk prey species were limiting so that managing the SW Forests for high prey abundance would benefit goshawks. However, in the BHNF, there is no evidence prey is limiting, and, in fact, the Forest Service’s “habitat capability” modeling indicate prey species are currently abundant and will remain abundant throughout the foreseeable future (i.e., well beyond the entire planning period). The kind of habitat that is limiting in the Black Hills is suitable nesting and post fledging areas (PFAs) which consists largely of dense stands of older trees. It would be wrong and scientifically indefensible to reduce stand density and age class when there is such a dire shortage of old growth habitat in the Black Hills. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 218

Public Concern: The Forest Plan Amendment should prohibit further degradation of habitat for goshawk, marten, land snails of special concern, and snag-dependent species.

Given the serious concerns over the viability and distribution of goshawk, marten, land snails of special concern, and snag-dependent species in the Black Hills, the Phase II amendment must prohibit any degradation in habitat and any decrease in habitat compatibility for these species. (The Revised Plan currently allows projects to be implemented even if they reduce habitat capability down to the 40% level – an arbitrary figure that does not ensure well-distributed, viable populations). (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 219

Public Concern: The Forest Plan Amendment should reintroduce extirpated indigenous species.

Conservation strategies must also be developed for species that have been extirpated from the Black Hills. The U.S. Forest Service is obligated to return species that have been allowed to be extirpated from the Black Hills through irresponsible management and misguided priorities. Strategies to reintroduce the black bear, gray wolf, grizzly bear, river otter and other extirpated species should be developed, in cooperation with the South Dakota Department of Game, Fish and Parks, through the Phase II Amendment. (Preservation/Conservation Organization, Boulder, CO – #32)

The Jasper Fire has presented an opportunity for at least a small portion of the Black Hills to be returned to the pristine condition it was over 150 years ago prior to non-Indian encroachment. It will be more than twenty years before logs will be large enough to harvest. Cattle cannot thrive in a burned area, yet bison can. I strongly recommend that the Jasper Fire Area be given a Wilderness designation with the reintroduction of bison which were indigenous to this area. (Individual, Wakpala, SD – #54)

Travel and Recreation

Forest Transportation System and Travel Opportunities

PC #: 220

Public Concern: The Phase II Draft EIS should disclose direct, indirect, and cumulative travel management effects on species viability and diversity.

The Revised Plan does not provide adequate direction for consistent, predictable travel management decisions although we recognize that Phase I converted all environmentally protective guidelines to standards. The 1997 Revised Plan/FEIS nor Phase I EA fully analyzed, evaluated and gave proper consideration to the direct, indirect and cumulative impacts of roads/trails (improved and unimproved, maintained and unmaintained) and road density on species viability and diversity. While roads provide special habitats for a few species, in general they create physical barriers, habitat fragmentation, resource damage, erosion and loss of forage production. Roads/trails (both motorized and non-motorized traffic) allow greater human access to remote areas, causing disruption to habitats and animal behavior and displacement of several species. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 221

Public Concern: The Black Hills National Forest should broaden its range of information resources for developing a roads impact analysis.

It has been a challenge for our agency (and probably other publics) to submit consistent comments on this forest use (roads, trails and vehicle use) when there is a clear lack of direction on off-road restrictions, reclamation guidelines or standards for closing roads, rehabilitation of problem roads and what measures are used to constitute resource damage due to road impacts and vehicular use. There is now more supportive, substantiated scientific documentation on road impacts to trust resources than what was available during the Plan Revision. Information is also available from state and federal departments of transportation. These sources, at a minimum, should be used in the analysis, evaluation and proper consideration of direct, indirect and cumulative impacts of roads/trails and road density on species viability and diversity. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 222

Public Concern: The Forest Plan Amendment should provide clear, consistent guidelines for road management.

Plan guidance is weak, at best, on construction, reconstruction and maintenance of Forest Development Roads and Trails. Objective 309 allows a 36% increase in net road construction and reconstruction (within a decade) in the Nation's most highly roaded Forest!!! Objectives 420-422 are weak. We concede that the Revised Plan outlines certain Management Areas and corresponding off-road and/or trail use but law enforcement is nearly non-existent.

The Revised Plan has no standards for limiting road density or reducing current densities outside of current policy that states that travel management will be evaluated at the project level to allow “management flexibility.” While we recognize that local managers should have the flexibility to reasonably determine travel management needs on a project by project basis, each District currently has its own interpretation of road bed standards, road maintenance levels and schedules, definitions of “roads” and policy for off-road use. It is our experience that there exists at least three different interpretations of the travel management/road engineering Handbook and Manual Directives. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 223

Public Concern: The Black Hills National Forest should seek to reduce road density.

There needs to be a reduction in road density on the forest (Black Hills NF is not alone in this area). The National Forest road system is much too massive. To achieve ecosystem health we need to reduce the roads. (Individual, Davis, CA – #9)

With respect to road density, it’s time to either obliterate – or simply close – many of them, to reduce the overall density of these intrusive reminders of man’s hand on the landscape. (Individual, Woodland Park, CO – #22)

ASSESS USEFULNESS OF ROADS AND ROUTES

For the purposes of the Phase II Amendment and environmental analysis, the USFS needs to complete a detailed forest-wide analysis of routes within the BHNF in order to accurately and effectively obliterate all unnecessary and environmentally damaging roads, two-track routes and user-created routes and effectively reduce road densities. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 224

Public Concern: The Forest Plan Amendment should prohibit future road construction.

Currently, 8,000 miles of roads are in places on the 1.2 million acre Black Hills National Forest, most created to facilitate logging. In the past, the Forest Service has not provided any rationale that supports maintaining 8,000 miles of roads, nor have they adequately maintained this excessive road system. Indeed, many experts have cited excessive road densities and lack of road maintenance on the Black Hills as negatively impacting wildlife and their habitat. It is time for the Forest Service to seriously address this issue and provide management direction that significantly reduces road densities on the forest as soon as possible. While we recognize the need for access to the forest, the current road densities are ridiculous – access is clearly not an issue. . . . This Phase II amendment should aim to significantly reduce the road density on the forest by prohibiting future road construction and by obliterating unnecessary and environmentally damaging roads and two-track routes. Additionally, the Forest Service should prohibit all future road construction—temporary and permanent—through the Phase II Amendment. (Individual, Portland, OR – #31)

PC #: 225

Public Concern: The Black Hills National Forest should allow roads to remain open for public access.

Roads should be maintained in an open state as much as possible to provide for ease of use by our citizens. (Individual, Spearfish, SD – #6)

PC #: 226

Public Concern: The Black Hills National Forest should obliterate roads to prevent future motorized use.

Road density reductions should be achieved only through ecologically sound road obliteration because yearlong or seasonal closures still present the potential for future use and thus negative impacts to wildlife and their habitat. We recognize the need for access to the forest, but the current road densities provide nearly unlimited access to the entire BHNF – access is clearly not an issue. Accordingly, there are very few areas available for nonmotorized or primitive recreational opportunities and very few areas of undisturbed wildlife and plant habitat. By reducing road

densities and restricting vehicle use to designated roads and trails, the USFS will be increasing the habitat needs of species sensitive to motorized disturbances, as well as providing ample opportunity for motorized recreational experiences, due to the routes that would remain even after a significant reduction in road densities. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 227

Public Concern: The Black Hills National Forest should rehabilitate closed roads to create local employment opportunities.

On the BHNF you need to close and rehabilitate redundant and damaging roads. That should offer some local employment opportunities. If only Congress would make less funds available for “Star Wars” and more funds available to you for restoration projects. (Individual, Bondurant, WY – #58)

PC #: 228

Public Concern: The Black Hills National Forest should develop a forest-wide travel management plan, designed to reduce road density and restrict motorized travel to designated roads.

The non-commercial, restoration-only alternative should be based on the following principles: Developing a forest-wide travel management plan that analyzes and assesses the need and the environmental damage associated with every vehicle route on the forest, significantly reduces the road density on the forest by obliterating unnecessary or environmentally damaging routes, and restricts off-road vehicle use only to designated routes and trails. (Preservation/Conservation Organization, Santa Fe, NM – #33)

LIMIT VEHICLE USE TO DESIGNATED TRAILS

It is time for the USFS to seriously address this issue and concerns raised by the experts, and provide management direction that significantly reduces road densities on the forest as soon as possible and creates an environmentally sound travel management plan that limits vehicle use (e.g. full-size vehicle use, all-terrain vehicle use, motorcycle use, and snowmobile use) only to designated roads and trails. (Preservation/Conservation Organization, Boulder, CO – #32)

Recreation Opportunities

PC #: 229

Public Concern: The Forest Plan Amendment should recommend trail and recreational facility closures to benefit ecological restoration and sensitive species protection.

For road/trail access management, the area’s increasing population and increased visitation to the Forest indicate that decisions will be needed regarding limits on the impacts of roads and trails. Recreation demand in the National Forests is a growing management concern. Increasing demands by off-road vehicle recreationists are likely to request access to more areas in the future. This may necessitate the creation of more campsites and trails. The LRMP Amendment should seek to minimize impacts to ecological sustainability and fish and wildlife. Full protection of remaining roadless areas, designated research natural areas (RNAs), and other special lands with significant ecological values will necessitate protective measures to be taken now by the Forest. Please consider seasonal or permanent trail and other recreation facility closures in areas that are proposed for ecological restoration or sensitive fish and wildlife protection. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 230

Public Concern: The Forest Plan Amendment should establish limits on invasive forms of forest recreation.

People with off-road vehicles do not have to have access to every single square foot of wilderness. There should be some areas free of the noise and damage and stress vehicles create. People can walk (mountain bikes can be pretty

destructive when used by careless people) in, and they don't have to be able to camp everywhere. (Individual, Laramie, WY – #10)

PC #: 231

Public Concern: The Black Hills National Forest should consider conducting a “Leave No Trace” educational program.

Some educational programs stressing the charm and benefits to all from the kind of wilderness outing which leaves no trace of the visitor would be a good idea, and would become popular with a lot of people. (Individual, Laramie, WY – #10)

PC #: 232

Public Concern: The Forest Plan Amendment should recognize hunting as a traditional and appropriate use of forest lands.

The revised Forest Plan should continue to recognize that hunting is a traditional and appropriate use of the National Forest and that in order to provide high quality recreational hunting, high quality habitat must be available. (Recreational Organization, Edgefield, SC – #1)

Natural Resource Commodities

PC #: 233

Public Concern: The Phase II Draft EIS should provide a cumulative impacts analysis of all extractive activities recognizing departures from natural conditions.

When analyzing the impacts of logging, grazing, road building, mining and off-road vehicle use, the USFS needs to fully analyze and assess the cumulative impacts of these activities with regard to the past, present and reasonably foreseeable future. This analysis and assessment should be both quantitative and qualitative. The Phase II Amendment must contain a serious and honest assessment of the cumulative impacts of these activities that must recognize the cumulative impacts of a century of ecological manipulation as a major departure from natural conditions. Management direction must restrict these activities in order to adequately minimize cumulative impacts and aid in restoring the Black Hills ecosystem. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 234

Public Concern: The Forest Plan Amendment should stipulate that any extractive or impactful project will require an EIS.

Phase II direction should stipulate that project level environmental analysis and assessment is conducted through environmental impact statements for all timber sales, allotment management plans, any mining activity, and travel management plan. This is necessary because any further impact upon the already heavily impacted BBNF ecosystem may lead to a complete breakdown of the BBNF ecosystem. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 235

Public Concern: The Black Hills National Forest should consider prohibiting road construction and exploration activities in areas that provide critical habitat.

Oil and gas leasing may be a significant concern in the Forest, particularly in areas that are identified as roadless or RNAs. Areas with high potential for oil and gas reserves, that also are in areas of high biodiversity and offer high-quality critical habitat for rare species or for the potential future recovery of ESA-listed endangered or threatened wildlife species, should be identified and protected for those purposes. Long-run analysis should consider the future of these lands and their best uses to the public. Consider prohibiting road construction and exploration in areas that are proposed for ecological restoration or that sustain sensitive fish and wildlife species. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 236

Public Concern: The Forest Plan Amendment should establish management direction that focuses on eliminating extractive uses of the Black Hills.

In our organization's opinion, the Black Hills contains far too few wilderness areas and far too many areas that have been heavily used to the detriment of ecosystem health. The Black Hills are a unique area that deserve special protection, rather than the heavy human use that has been typical during the past 130 years. As the source of water for a large area and a recreational haven that is a basis of the local economy, it is important that every opportunity be taken to allow the Hills to retain or regain clean, non-extractive uses. (Preservation/Conservation Organization, Sioux Falls, SD – #5)

End development/extraction activities in this area. (Individual, Minneapolis, MN – #40)

PC #: 237

Public Concern: The Phase II Draft EIS should provide an analysis of all economic and biological values for proposed timber harvest areas.

Mature and old-growth stands generally have relatively higher values for both harvesting for economic use and for wildlife habitats. A breakdown of the economic and biological values in areas that are proposed for harvest would be helpful to the affected public groups and to decision-makers. Those impacts that are not monetized should be captured in physical or other measures where possible. For example, impacts to wildlife populations and habitat are difficult to monetize, but by displaying the wildlife habitat and other natural resource benefits that flow from the Forest it will be possible for the public and decision-makers to compare the economic benefits and costs alongside environmental and other effects that are not monetized or quantified. An analysis should answer the broad questions of how to best protect human, natural resource, and environmental values. Even if there is substantial uncertainty associated with the various effects, any information about the likelihood and direction of impacts would be helpful to reviewers of the document. A reasonable way to compare monetary and non-monetary impacts is a matrix that describes all impacts from various proposed actions or alternatives. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 238

Public Concern: The Black Hills National Forest should not log to maintain forest health.

The excuse that logging is necessary to maintain forest health is an arbitrary statement, as natural processes that maintain forest health have been in place for millions of years and are the most effective means of maintaining healthy ecosystems. Further, the wildlife of the BHNF have evolved with these processes and are most adapted to these processes, not human activities like logging and road building. It is obvious that logging to maintain forest health is not desirable for wildlife species and their habitat, contrary to the myths perpetuated by the timber industry. (Preservation/Conservation Organization, Boulder, CO – #32)

PC #: 239

Public Concern: The Forest Plan Amendment should prohibit even-aged logging to benefit wildlife.

No further . . . even-aged logging. Road building and even aged silvicultural prescriptions are largely responsible for the plight of many of the species in question. The Revised Plan allows such extensive even-aged harvesting that protection of wildlife resources is completely compromised. Large blocks of interior forest habitat is a significant wildlife resource for neotropical birds; large patches of SS-4C and SS-5 habitat are significant wildlife resources for goshawks and other species; large snags are a crucial wildlife resource for cavity nesting birds; and unroaded security areas are an important wildlife resource for reclusive and human-persecuted species such as the mountain lion and black bear. . . . And there are alternatives to shelterwood cuts, seed cuts, overstory removals, and patch clearcutting. The Phase II EIS must focus on the wildlife benefits of alternatives that would curtail roadbuilding and even-aged logging. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 240

Public Concern: The Forest Plan Amendment should prohibit salvage logging in order to promote natural ecological processes.

It is obvious that logging to maintain forest health is not desirable for wildlife species and their habitat, and is a myth perpetuated by the timber industry. The Phase II Amendment needs to allow these processes to naturally occur on a large-scale and should prohibit all salvage logging in order to provide adequate and well-distributed snag habitat, insect prey for insectivorous species, restore meadows and hardwoods, reduce fire risk and aid in nutrient recycling. (Individual, Portland, OR – #31)

PC #: 241

Public Concern: The Forest Plan Amendment should retain land acreage within the Jasper, Elk Mountain, and Roger's Shack fires as suitable for harvest.

The suitable land acreage within the Jasper, Elk Mountain and Roger's Shack fires should not be removed from the suitable land base. In the worst scenario those areas would be temporarily unavailable for ASQ determination, but would remain in the suitable land base. (Wood Products Industry/Association, Hulett, WY – #19)

PC #: 242

Public Concern: The Black Hills National Forest should use all available resources when determining the Allowable Sale Quantity.

The Forest Service should incorporate the latest technological advances and best available silviculture/timbering practices into their analyses when reviewing and/or recalculating the Allowable Sale Quantity (ASQ). We encourage the Forest Service to coordinate closely with industry and the other stakeholders while addressing the ASQ issue. (State of Wyoming, Office of Federal Land Policy, Cheyenne, WY – #21)

PC #: 243

Public Concern: The Forest Plan Amendment should maintain the Allowable Sale Quantity at a minimum of 86 million board feet.

The ASQ must be maintained at a minimum of 86 MMBF and in fact should be increased. (Individual, Spearfish, SD – #6)

PC #: 244

Public Concern: The Forest Plan Amendment should reduce the Allowable Sale Quantity to account for fire-caused timber volume losses.

The Allowable Sale Quantity on the BBNF must be reduced to fully account for the reduction in timber volume caused by the Jasper Fire. (Preservation/Conservation Organization, Rapid City, SD – #8)

PC #: 245

Public Concern: The Forest Plan Amendment should balance Allowable Sale Quantity determinations with appropriate habitat management direction.

We recommend that the ASQ be based on science and sustainability, not politics. If the ASQ is increased in the short term, we recommend the following habitat enhancements: increased grass/forb stage, meadow expansion, hardwood release, water yield emphasis and fire simulation cuts. Prescriptions should increase age/stand diversity and to improve big-game cover to forage ratio. Avoid large blocks or monotype cuts of 40, 60 and 80 BA. If the FS determines the ASQ should be reduced, we support the optimum volume of timber to be cut that is compatible with other multiple resources. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 246

Public Concern: The Black Hills National Forest should require collection and burning of slash piles in order to decrease future fuel loads.

Please require the loggers to pull the trees to an area so slash can be piled up and burnt. Dead branches scattered all over the forest will make a fire all the worse and it makes it difficult for the cows to graze. Also deer, elk and people are affected. (Individual, Deadwood, SD – #24)

PC #: 247

Public Concern: The Black Hills National Forest should expand the application of Variable Density Thinning within management prescriptions.

We support more “creative” timber management across the Forest versus monotype, even-aged ponderosa plantations. Further, we are pleased BHNF incorporated Variable Density Thinning into their management program to increase diversity. However, this is applied only to certain management prescription amounting to 37% of the Forest. Unfortunately, VDT can be applied only up to 20% of each area, thus, approximately 7% of the Forest. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 248

Public Concern: The Black Hills National Forest should void the Goat Timber Sale and propose the area for protected status.

We feel that the Goat Timber Sale should not just be suspended, but voided, and that this area should have permanent protected status to preserve its matchless beauty for all future generations of hikers and nature lovers. (Preservation/Conservation Organization, Custer, SD – #49)

PC #: 249

Public Concern: The Black Hills National Forest should consider a significant plan amendment to address range management and monitoring.

The Revised Plan simply does not contain adequate direction for range management, resource monitoring and livestock grazing (although we recognize that Phase I converted all environmentally protective guidelines to standards). During the 1990’s Plan Revision, our agency was on record stating that range management should have been a revision topic rather than a forest use to be reviewed through the allotment management plan process and Recision Act. . . . We support livestock grazing of public lands given proper and integrated disciplinary management direction. According to the Forest Service’s 5-year evaluation used in the 1990’s Plan Revision, range analysis showed 48% of the range was in unsatisfactory condition. Trend data alone suggested and warranted re-examination of the range program over 10 years ago. By addressing range management as a significant Plan Amendment, it surely will improve the Forest Service’s credibility with varying publics. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

EMPHASIZE AN INTERDISCIPLINARY APPROACH TO RANGE MANAGEMENT

Range management philosophy is based on a multi-disciplinary approach, which supports and promotes stewardship of healthy ecosystems. Range management is based on scientific principles that meet management goals and society needs such as: habitat for diverse wildlife species, enhanced water quality, minimized soil erosion and sedimentation and appropriately planned and monitored livestock grazing. In other words, range management is about much more than domestic animal husbandry. It is also about conserving, managing and sustaining the varied resources of the rangelands. As currently written and implemented, we do not believe the Revised Plan addresses range management as defined and does not bring an interdisciplinary approach to range management on BHNF. (South Dakota Department of Game, Fish, and Parks, Rapid City, SD – #61)

PROVIDE MITIGATION MEASURES

Our experience is that range/livestock issues and problems are usually addressed on a long-term basis through the AMP process. Lack of range monitoring and permittee oversight shortstops reasonable corrective responses and proactive mitigation. The Revised Plan does not provide direction to prevent nor rectify impacts to resources by livestock grazing and as such, lack of corrective measures leads to long-term resource damage and/or cumulative

impacts to trust resources. AMP Environmental Assessments from the 1990's identify many problems but there is no Plan direction to ensure or enforce mitigation. A trust resource on BBNF impacted by range activities is riparian areas. . . . Other potentially impacted resources and range issues that warrant Plan amendment analysis include: wildlife-livestock conflicts, lack of understory forage/browse production required for both livestock and wildlife, establishing and properly implementing grazing systems, strategies to improve range condition, deferment after wildfire, rest-rotation, noxious weeds, permittee oversight and proper protection of hardwood stands, sensitive plants and unique plant assemblages/communities. (South Dakota Department of Game, Fish, and Parks, Rapid City, SD – #61)

PC #: 250

Public Concern: The Phase II Draft EIS should disclose historic and current grazing impacts on rangeland resources.

The DEIS should disclose how grazing historically has affected soils, water tables, vegetation, erosion, stream flows, and water quality. The goal of the Taylor Grazing Act, and numerous Federal statutes that have followed, is to rehabilitate rangelands in the United States. Rehabilitation is to be accomplished partly through controlling the numbers of livestock using the public lands for forage, protection of riparian areas (fencing and off-stream stock watering), rotation of animal herds, and so forth. The DEIS should disclose historic rangeland condition historically, comparing its current condition to past baseline conditions (pre-settlement condition and earlier, more degraded conditions), to evaluate how recent rangeland management practices have affected the resource, and to prescribe future management options and evaluation. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 251

Public Concern: The Black Hills National Forest should ensure Allotment Management Plans are in compliance with pertinent regulations.

In 1997, Hell Canyon and Mystic Districts initiated revision of several AMP's to comply with the Recision Act of 1995 and made great progress. However, some of those AMP's are yet to be revised, and according to our files, are anywhere from 10-20+ years old. Are our files outdated or are some AMP's truly that old? Do older AMP's meet NEPA and/or FLPMA requirements? If not, it is our understanding that it maybe inappropriate to issue a grazing permit without appropriate NEPA documentation. If we interpret the regulations correctly, an AMP requires one of these NEPA documents: an EIS if there is significant effect on the environment, or a Finding of No Significant Impact (BNNF in 1997 based the FONSI on an Environmental Assessment) or a Categorical Exclusion. Is this paragraph correct and please explain if not. . . . We have not fully tabulated the current status for all allotments/livestock permits within fire perimeters, but for the Jasper fire alone, only the Ditch Creek, Six Mile, Murphy, Darrow and Limestone Allotments were reassessed in 1997. As mentioned in the 1997 EA's, there were several Allotments with expiring permits. What is the status of those expiring permits? When does the Forest Service plan to update those AMP's, especially those now within fire perimeters? Are these expired permits in compliance with the Recision Act of 1995 and other regulations? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 252

Public Concern: The Black Hills National Forest should revise Allotment Management Plans to meet Forest Plan goals and objectives.

If current AMP's are either extremely old or have not been revised since the fires, and if all infrastructure such as fences, spring enclosures, and water developments have not been replaced, how will the Districts achieve proper livestock management to meet Forest Plan goals and objectives? . . . For those Allotments which were revised in 1997, perhaps a Supplemental Information Report is an optional approach? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

IMPLEMENT POST-FIRE CHANGES

There are several pre-fire Forest Service documentations of improper or overgrazing situations (Revised 1996 Final EIS for the Land and Resource Management Plan, Jasper BAER Report, J-RAT, 1997 Livestock Grazing EA's), for montane, riparian and hardwood area health and full functioning conditions. Certainly, AMP and monitoring are tools to help identify these situations and allow flexibility to implement corrective measures. However, these areas

of concern identified by the Forest indicate that livestock grazing and its management should not continue in the same pre-fire fashion if the Forest hopes to stabilize and improve landscape conditions. The two actions are mutually exclusive. Therefore, while the cattle are off the majority of the burned areas, could the Forest take advantage of this major change in landscape conditions to implement post-fire changes in grazing utilization and cattle distribution so to avoid these situations? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 253

Public Concern: The Black Hills National Forest should refer to the Nebraska National Forest Plan Revision as a range management source.

Livestock grazing on public lands is a local, State and National issue. We suggest BHNF take a look at Nebraska National Forest's Plan Revision (no ROD as of yet) as it pertains to range management. It would behoove the BHNF to act now in a reasonable fashion through a Plan Amendment rather than through forced litigation, which is happening in most Western States. (South Dakota Department of Game, Fish and Parks, Rapid City, SD – #61)

PC #: 254

Public Concern: The Black Hills National Forest should consider a grazing management plan to help avoid adverse environmental impacts.

EPA expects the LRMP to consider some of the following techniques to avoid further adverse environmental impacts and/or to restore degraded rangeland resources in the Forest: Actively manage grazing allotments for grazing frequency, duration, stocking rates, animal distribution, season and timing of forage use, and minimal wildlife use conflicts. – Fence or otherwise protect riparian zones. – Eliminate livestock and erect enclosures in areas that are proposed to restore ecological resources or protect sensitive fish and wildlife species. – Permanently or seasonally eliminate or limit livestock numbers and types in areas that are predisposed to damage during periods of high sensitivity. – Vacated grazing allotments, if any, should be considered to remain vacated to provide areas for recovery and future restoration opportunities. – Actively restore (for example, weed control or reseeded) areas that are severely degraded. – Structures or management practices should be considered to stabilize eroded or at-risk streambanks. – Incorporate flexibility in allotment permits to account for special circumstances, such as excluding livestock during drought periods or to restore sensitive wildlife species. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 255

Public Concern: The Forest Plan Amendment should maintain Animal Unit Months at current levels.

AUM's should be maintained at a steady level to provide stability for our ranchers. (Individual, Spearfish, SD – #6)

PC #: 256

Public Concern: The Black Hills National Forest should remove livestock from areas where forest health is deteriorating.

Removal of livestock should be a priority where noxious weeds are a problem, where meadows are being encroached upon by pines and where hardwoods are diminishing. (Individual, Portland, OR – #31)

PC #: 257

Public Concern: The Black Hills National Forest should develop and share methodologies of determining when post-fire areas are ready for the resumption of grazing.

During an interagency coordination meeting regarding the rehabilitation of recently burned areas which was held on September 12, 2001, between the South Dakota Department of Game, Fish, and Parks (Department), the Black Hills National Forest (Forest), and the Service, there was extensive discussion about the resumption of cattle grazing in recently burned areas, specifically the Jasper Fire Area. It would be helpful if the Phase II Amendment could provide justifications or criteria to indicate when and at what level resumption of domestic cattle grazing would

occur. . . . The absence of published methods to determine the readiness of an area for the resumption of grazing makes it difficult for interested parties to provide input or supplemental guidance. The development and use of such methodologies by the Forest would assist cooperators in understanding decisions made regarding the reintroduction of livestock in post-fire areas. (U.S. Fish and Wildlife Service, Pierre, SD – #59)

Our agency has informally requested on at least two separate occasions, the most recent at a Joint Agency meeting on September 12th at the Forest Supervisor's Office, the proposed District Plans for determining post-fire range readiness for reintroduction of livestock, an explanation of allotment monitoring methodology including data collection and reporting procedures and an explanation of Forest Service authority to make changes to Allotment Management Plans (AMP's) and grazing permits. It is my understanding that no quantitative vegetation monitoring was conducted within fire perimeters this growing season (outside of the Rocky Mountain Research Station and Colorado State University research project) although at least two permittees were given special permission to graze within the Jasper fire boundary in 2001 and there were trespass cattle as well. We do not understand why preferential treatment was given to at least two permittees without an environmental assessment or an interdisciplinary team decision. Again, your staff has demonstrated the willingness to accommodate us in the field to discuss some of these issues. However, we are still looking for some answers. We have not been shown monitoring data. We have not seen a plan to mitigate post-fire livestock grazing and its effects on forest and range health. Yet, we hear that the Forest Service must give the affected livestock permittees a decisive answer by early November. We are concerned if there will be supportive public documentation to back your decision – whatever that may be. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

ENSURE INFRASTRUCTURE IS REPLACED

The 1997 Livestock Grazing EA's stated that "fencing is an integral part of livestock grazing management." If the infrastructure within the fires is not completely restored, how will the Forest implement management directives? (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

PC #: 258

Public Concern: The Black Hills National Forest should publish range monitoring results in the Fiscal Year 2001 Annual Report.

The FY 2000 monitoring is probably pre-fire monitoring for the Jasper area but even so, why did not the Forest Service explain to us and show us this monitoring data when we requested it? And, according to the FSM and FSH, permittee monitoring is only one form of monitoring. While permittee monitoring is a positive and productive way to involve permittees in his or her vested interest in public land grazing, it is still in its beginning stages in the Black Hills National Forest. We anticipate reviewing the monitoring results to be reported in the FY2001 Annual Report. (South Dakota Department of Game, Fish and Parks, Pierre, SD – #62)

Social and Economic Considerations

PC #: 259

Public Concern: The Phase II Draft EIS should address possible social and economic impacts to local communities resulting from management actions.

The economic and social effects on local communities should weigh heavily in the Phase II Amendment's analysis and alternative selection. (Individual, Rapid City, SD – #52)

The social and economic impacts on local industry and communities must be carefully considered in the analysis and decision making process. (South Dakota Department of Agriculture, Pierre, SD – #48)

We appreciate the Forest's intent to analyze the economic and cultural impacts of this Decision on local communities, especially those which are Forest-dependent. (State of Wyoming, Office of Federal Land Policy, Cheyenne, WY – #21)

Alternatives should be analyzed in terms of their potential social and economic impacts, and care taken to avoid selection of alternatives with the potential for negative impacts. (Individual, Belle Fourche, SD – #7)

PC #: 260

Public Concern: The Black Hills National Forest should be preserved for future generations.

It came to my attention that the Forest Service is looking for public input regarding the management of the Black Hills area. I'm writing to you today to express my sincere desire to see that this area be preserved for future generations. (Individual, Longmont, CO – #29)

PC #: 261

Public Concern: The Black Hills National Forest should give primary consideration to meeting the needs of the local communities.

The Forest Service must place the greatest emphasis on meeting the needs of the local communities, those most affected by the decisions made. This plan can make or break our communities. Strong timber and ranching industries must be maintained in order to be the tools the Forest Service uses to carry out their management decisions. Once lost, these industries are almost impossible to replace. Without them, the forest would continue to self-destruct and tourism would collapse as well. Mining and outdoor recreation are of enormous importance to us also and should be maintained and enhanced as much as possible. To maintain our vital industries, the Forest Service must complete the Phase II amendment on time and in a manner favorable to local need and attitudes. (Individual, Spearfish, SD – #6)

PC #: 262

Public Concern: The Black Hills National Forest should strive to achieve the most socioeconomic benefits while protecting and restoring ecological values.

Multiple uses and users of the Forest have conflicting goals, and both Forest uses and management activities will affect other uses and users. There is a need to meet the demands for the Forest's uses in a way that achieves the most socioeconomic benefits while protecting and restoring the environmental and ecological values that are expected to be sustained in the Nation's Forests. Broad consideration and disclosure of all benefits and costs is important under each alternative, including monetary and qualitative effects. (U.S. Environmental Protection Agency, Denver, CO – #60)

PC #: 263

Public Concern: The Black Hills National Forest should recognize the effects of the planning timeline on the local economy and communities.

There is a huge economic impact that will be brought about by delay. Every day that the process is delayed increases the risk of shutdown of our forest products industry in Lawrence County and the loss of over 500 high-paying jobs. We have just suffered a huge blow to our economy from the Homestake shutdown, which will terminate over 400 high-paying jobs, and we hope that you will do what is needed to prevent the closing of another major industry in our county. (Lawrence County Commissioners, Deadwood, SD – #2)

This timetable also puts the forest products company, that I and another 500 people who either directly or indirectly depend on it for a livelihood, at risk of closing. That does not seem to be important to the Forest Service anymore when I hear a line officer make a comment like "we should convert our mill into an appliance factory." (Individual, Spearfish, SD – #14)

PC #: 264

Public Concern: The Black Hills National Forest should recognize the benefits of road closures to local economies.

Road closures can benefit local economies by providing jobs to workers re-contouring and revegetating roadbeds. (Individual, Boulder, CO – #38)

PC #: 265

Public Concern: The Black Hills National Forest should recognize the economic value of recreation as compared to mining and grazing.

Do you measure the value of watersheds and clean air? We know recreation brings in many more dollars than mining and cattle grazing yet the FS continues to emphasize these activities that destroy our public lands. (Individual, Big Pine Key, FL – #37)

PC #: 266

Public Concern: The Black Hills National Forest should consider the Timber Industry's role in defining the culture, custom, and economy of the Black Hills area.

The harvest of timber and the production of wood products has been and currently is an important part of the custom and culture of Lawrence County. Historical documents give evidence that when this county was settled during the late 1800's many people were gainfully employed in the harvesting of trees for the many types of woods products that these early settlers needed. It is estimated that by 1897 over 1.5 billion board feet had been harvested from the Black Hills for use by these earlier settlers. The harvest of this timber also created wealth for the people by providing much needed jobs and economic activity. The 1940 census shows that 1022 people were directly employed by the forest products industry. . . . The 1990 census indicates that almost 500 people were employed in Lawrence County by this industry providing over \$14 million in wages and benefits. These wages are some of the highest paid by any industrial sector operating in the county. The economic impacts that Lawrence County receives from the Black Hills National Forest selling timber is significant. (Lawrence County Commissioners, Deadwood, SD – #2)

MULTIPLE USE OF THE BLACK HILLS

Phase II should incorporate in a meaningful way considerations and data relating to the real social and economic effects on the local Black Hills communities impacted by the management plan. Continued multiple use of our Forest is important to the custom, culture and economy of our area and should be a major consideration during the amendment process. (Multiple Use/Land Rights Organization, Hulett, WY – #44)

PC #: 267

Public Concern: The Phase II Draft EIS should analyze adverse economic impacts from the current timber program.

We are concerned especially about . . . the adverse economic effects of the national forest logging program. We are particularly concerned about the Forest Service's failure to quantify such economic effects at the project level or for the program as a whole. The logging program increases costs of water purification and filtration, decreases the value of private timberlands, unfairly competes against alternative fiber and building material businesses, increases wildfire risk, increases repair and maintenance costs for highways and public roads, and decreases the number of jobs in recreation, tourism, fisheries, and alternative forest products. (Preservation/Conservation Organization, Santa Fe, NM – #33)

Tribal Rights and Cultural Resources

PC #: 268

Public Concern: The Forest Plan Amendment should comply with statutory provisions with regard to all known and unknown cultural resources.

The methodologies for the treatment of cultural resources, and particularly human remains, must be addressed in accordance with the provisions of the Native American Graves Protection and Repatriation Act, the Archaeological Resources Protection Act of 1979 (as amended), and all other pertinent legislation and implementing regulations with regard to all cultural resources now known or yet to be discovered. (U.S. Bureau of Indian Affairs, Aberdeen, SD – #35)

Non-Governmental, Pre/Post Notice of Intent Comment Period Public Concerns

PC #: 269

Public Concern: The Forest Plan Amendment should prescribe wilderness management for the Jasper fire area.

It has been brought to our attention that the future of the Jasper fire area is being considered at this time. As the area has been rendered useless for logging for the time being, our organization would like to suggest that this is a golden opportunity to allow the area to return to a natural state that would eventually be eligible for wilderness designation. (Preservation/Conservation Organization, Sioux Falls, SD – #5)

I am writing to ask if you would please consider returning the Jasper fire area in the Black Hills National Forest into wilderness status. Given the devastation . . . , this would seem like a good and right time for what is a small portion of the Black Hills to be returned to its original status. (Individual, Stoke-on-Trent, England – #15)

PC #: 270

Public Concern: The Forest Plan Amendment should recognize the rights of Native Americans and ensure conditions conducive to cultural and religious practices on the Forest.

The Black Hills were held sacred by the Lakota people for millennia, and were used for religious purposes with no adverse damage to the area. The discovery of numerous cultural sites as a result of the Jasper Fire shows the religious use that was prevalent in this area. Now, the Black Hills are covered with roads and other forms of Euro-American development. Finally, American Indian people have a right to access, and traditional religious use of the recently uncovered cultural sites. Although the Indian Religious Freedom Act has been in effect for more than 23 years, the desecration of the Black Hills, and the increased non-Indian human population in the area has defiled the environment needed for religious practices. (Individual, Wakpala, SD – #54)

We are also aware of the provisions of the 1868 Fort Laramie Treaty and the American Indian Religious Freedom Act, which give Native Americans rights in the Black Hills that have generally not been recognized. The return of the Jasper Fire Area to a pristine condition would not only provide a healthier ecosystem and better recreational opportunities, but would allow the use of the area for spiritual uses that are impossible under the current conditions prevalent in most of the Black Hills National Forest. (Preservation/Conservation Organization, Sioux Falls, SD – #5)

Appendix A – Content Analysis Process

Public input on the Black Hills National Forest Land and Resource Management Plan Phase II Amendment (scoping) is documented and analyzed using a process called content analysis, which is a systematic method of compiling and categorizing the full range of public viewpoints and concerns regarding a plan or project. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into preparing the Phase II Amendment. All responses (i.e., letters, emails, faxes, and other types of input) are included in this analysis.

In the content analysis process used for this project, each response is given a unique identifying number, which allows analysts to link specific comments to original letters. Respondents' names and addresses are then entered into a project-specific database program, enabling creation of a complete mailing list of all respondents. The database is also used to track pertinent demographic information, such as responses from special interest groups or federal, state, tribal, county, and local governments.

All input is considered and reviewed by two analysts. Each response is first read by one analyst and sorted into comments addressing various concerns and themes. A second analyst reviews the sorted comments to ensure accuracy and consistency. Comments are then entered verbatim into the database. In preparing the final summary analysis, public statements are reviewed again using database printouts. These reports track all coded input and allow analysts to identify a wide range of public concerns and analyze the relationships between them. The final product includes a narrative description of public comment by topic, a list of public concerns addressing the proposal, and supporting sample quotations.

This process and the resulting summary are not intended to replace comments in their original form. Rather, they provide a map to the letters and other input on file at the Forest Supervisor's office in Custer, South Dakota. Both the planning team and the public are encouraged to review the actual letters firsthand.

It is important for the public and project team members to understand that this process makes no attempt to treat comments as votes. In no way does content analysis attempt to sway decision makers toward the will of any majority. Content analysis ensures that every comment is considered at some point in the decision process.

Appendix B – Demographics

Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database can be used to isolate specific combinations of information about public comment. For example, a report can include public comment only from people in South Dakota or a report can identify specific types of land users such as recreational groups, preservation organizations, or businesses. Demographic coding allows managers to focus on specific areas of concern linked to respondent categories, geographic areas, and response types.

Although demographic information is captured and tracked, it is once again important to note that the consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the analysis team attempts to capture all relevant public concerns in the analysis process. Approximately 411 letters, representing 1,683 signatures, were received in response to the Notice of Intent (NOI) to prepare an environmental impact statement for the Phase II Amendment to the Black Hills National Forest 1997 Revised Land and Resource Management Plan.

Many responses were submitted to the Black Hills National Forest before or after the comment period (November 28, 2001 – January 28, 2002). These responses are tracked using a different stage of process labeled Pre/Post NOI. While their demographic information is not represented in the following tables, these responses are part of the content analysis process and do support and amend the Public Concerns list.

Geographic Representation

Geographic representation is tracked for each response submitted in the comment period during the course of content analysis. Correspondence was received from 14 of the United States, with over 90% of the total correspondence coming from South Dakota and Wyoming. The response format did not reveal geographic origin for 3 responses.

States of residence for each individual signature were not tracked for responses with multiple signatures. Signatures on these responses were all assigned to the state of the person or organization originating the correspondence.

Table 1.a – Geographic Representation of Response by Country and State

Country	State	Number of Responses	Number of Signatures
United States	California	2	2
	Colorado	8	10
	Florida	1	1
	Idaho	2	2
	Kentucky	1	1
	Michigan	1	1
	Minnesota	2	2

Country	State	Number of Responses	Number of Signatures
	Montana	2	2
	New Mexico	1	1
	Oregon	1	1
	South Carolina	1	1
	South Dakota	302	1,570
	Wisconsin	1	1
	Wyoming	83	85
	Unknown Location	3	3
Total		411	1,683

Table 1.b – Geographic Representation of Response by South Dakota and Wyoming Counties

State	County	Number of Responses	Number of Signatures
South Dakota	Brookings	1	1
	Brown	1	1
	Butte	19	19
	Custer	9	44
	Fall River	4	4
	Hughes	1	1
	Lawrence	127	129
	Meade	13	13
	Pennington	127	1,358
	Total		302
Wyoming	Albany	4	4
	Carbon	1	1
	Crook	66	67
	Laramie	4	4
	Natrona	1	1
	Sublette	1	2
	Sweetwater	1	1
	Weston	5	5
	Total		83

Organizational Affiliation

Responses were received from various organizations and unaffiliated individuals. Respondents include federal, state, and county government agencies and representatives, multiple use/wise use organizations, environmental groups, timber associations, as well as several others. Organization types were tracked for each response submitted during the comment period.

Table 2 – Number of Responses/Signatures by Organizational Affiliation

Organization Field	Organization Type	Number of Responses	Number of Signatures
C	County Government Agency/Elected Official	2	3
F	Federal Agency/Elected Official	2	2
I	Unaffiliated Individual	392	395
L	Timber and Wood Products Industry or Associations	3	3
P	Preservation/Conservation Organization	6	43
R	Recreational Organization (Motorized/Non-motorized, non-specific)	1	1
S	State Government Agency/Elected Official	3	3
Z	Multiple Use/Wise Use Organization	2	1,233
Total		411	1,683

Response Type

Response types were tracked for each response submitted during the comment period. Responses were received in the form of letters, forms, and one resolution.

Table 3 – Number of Responses/Signatures by Response Type

Response Type #	Response Type	Number of Responses	Number of Signatures
1	Letter	51	91
2	Form	359	360
3	Resolution	1	1,232
Total		411	1,683

Appendix C – Organized Response Report

Organized response campaigns represent nearly 88 percent of the total responses submitted during the public comment period for the proposal (362 out of 412). Five or more responses, received separately but containing identical text, constitute a “form.” If a response does not contain all of the text presented in a given form, it is entered as an individual letter. Duplicate responses from four or fewer respondents are also entered as individual letters.

Once a form is identified, we designate a “form master” and enter its content into the database. All responses with matching text are then linked to this master form within the database with a designated “form number.” If a response contains additional relevant text, the comments are coded and entered into the database. These responses are defined as a “Form Plus” or as a “Form with additional comments.”

The following table presents the number of responses associated with each form and summarizes the concerns found therein.

Table 4 – Forms

Number of Form	Number of Responses	Description of Form
1	359	Advocates a multiple use approach for the management of the Black Hills National Forest: Calls for the Forest Service to equitably weigh forest health issues, wildlife species viability, social and economic considerations, and recreational opportunities.

The following table presents the number of signatures associated with each multiple respondent response, and summarizes the concerns therein.

Table 5 – Multiple Respondent Responses

Letter Number	Number of Signatures	Description of Response
50	1,232	A resolution calling for the Forest Service to address the forest health and wildfire crises as well as complete the Phase II amendment by the end of 2002.

Appendix D – Immediate Attention Letters

The immediate attention designation is attached to public responses in the content analysis database for a variety of reasons. Our intent is to identify responses that fall into certain key categories, such as threats of litigation, comments from government officials, etc. These designations alert the project team members to public concerns or inquiries that may require an immediate or detailed response for policy, political, or legal reasons.

The immediate attention designated responses are primarily intended for an internal audience. The categories of responses selected are designed to meet project team needs. This report is not intended to, nor should it be construed to, obviate the need to review all responses. Due to the importance of providing a more direct or rapid response to these comments, CAT has listed all immediate attention correspondence submitted both within and outside of the comment period dates.

CAT identified eight categories of comment type. The relevant designations are outlined below and followed by report tables. Those categories without comments falling under them do not have a table represented in this appendix.

1. Threat of harm – Threats of physical harm to project or agency personnel or others.
2. Notice of appeal or litigation – Notices of respondents' intent to appeal an action or bring legal suit to bear on the agency.
3. Freedom of Information Act (FOIA) – Official requests for information and documentation under the FOIA.
4. Provides proposals for alternatives – Suggestions for a comprehensive alternative to the proposed action. Does not include critiques of alternatives or partial changes of existing alternatives. Must be substantive letters.
5. Requires detailed review – Well-written analyses of the issues. They are informative and help frame questions.
6. Government entities – Responses from elected officials in their official capacity from federal, tribal, state, county and municipal government entities. Official correspondence from agencies of these various governments is marked in this category and does not include government employees writing on their own behalf.
7. Extension of comment period.
8. Request for public hearing.

Table 6 – Proposals for Alternatives

Letter Number	Name and Address
#8	Black Hills Group, Sierra Club, P.O. Box 1624, Rapid City, SD 57709
#32	Biodiversity Associates, P.O. Box 1512, Laramie, WY 82073
#33	Forest Conservation Council, Western Regional Office, P.O. Box 22488, Santa Fe, NM 87502
#422	Cold Mountain, Cold Rivers, P.O. Box 7941, Missoula, MT 59807

Table 7 – Requires Detailed Review

Letter Number	Name and Address
#49	Friends of Calamity Peak, P.O. Box 232, Custer, SD 57730
#61	South Dakota Department of Game, Fish and Parks, Regional Office, 3305 West South Street, Rapid City, SD 57702-8160
#62	South Dakota Department of Game, Fish and Parks, Foss Building, 523 East Capitol, Pierre, SD 57501-3182

Table 8 – Government Entities

Letter Number	Name and Address
#2	Lawrence Country Commissioners, P.O. Box F, 90 Sherman Street, Deadwood, SD 57732
#21	State of Wyoming, Office of Federal Land Policy, Herschler Building, 1W, 122 W. 25th Street, Cheyenne, WY 82002
#34	US Department of the Interior, Fish and Wildlife Service, Ecological Services, 4000 Airport Parkway, Cheyenne, WY 82001
#35	US Department of the Interior, Bureau of Indian Affairs, Great Plains Regional Office, 115 Fourth Avenue S.E., Aberdeen, SD 57401
#48	South Dakota Department of Agriculture, Office of the Secretary, 523 East Capitol Avenue, Pierre, SD 57501-3182
#55	State of Wyoming, Game and Fish Department, 5400 Bishop Boulevard, Cheyenne, WY 82006-0001
#56	Wyoming Business Council, Mineral, Energy and Transportation Division, 214 West 15th Street, Cheyenne, WY 82002
#57	Board of Crook County Commissioners, P.O. Box 37, Sundance, WY 82729-0037
#59	US Department of the Interior, Fish and Wildlife Service, Ecological Services, 420 South Garfield Avenue, Suite 400, Pierre, SD 57501-5408
#60	US Environmental Protection Agency, Region 8, 999 18th Street, Suite 300, Denver, CO 80202-2466

Appendix E – List of Preparers

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