

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
4	3	Trvl/Rec
Hagemann		Chuck

Comment:

I can see why there is a need to protect Rapid Creek, Prairie area does get heavy use. But closing all the area down will only push the problem deeper into the Hills. I don't believe the Forest Service or the public has did there part in preventing misuse of the Forest. I don't go off roads or go into the Forest when it is wet. I pick up garbage every time I see it and have told my family to do the same. If people follow guidelines, are kids will be able to do

Agency Response:

The three action alternatives provide a range of travel and recreation use opportunities: from a strong non-motorized emphasis in Alternative B, to a mix of motorized and non-motorized use in Alternative C, and travel and recreation use as guided by the current Forest Plan in Alternative D. We agree that there is considerable misuse and abuse of the Forest from a travel and recreation use standpoint. Actions proposed in the Prairie Project are intended to provide clear guidance as to location and associated travel and recreation use opportunities

Letter No:	Comment No:	Resource
4	4	Plan
Hagemann		Chuck

Comment:

I have more to say but I think common sense is all that is needed to manage the Black Hills. Let the Forest Service do there job. Letting nature take it's course is not practical.

Agency Response:

Thank you for your support of the Prairie Project and management of the Black Hills National Forest.

Letter No:	Comment No:	Resource
5	1	Plan
Sorensen		Peter

Comment:

I have no comments, please send me the entire Final EIS and Record of Decision (ROD).

Agency Response:

Comment form received and request noted.

Letter No:	Comment No:	Resource
5	2	Plan
Sorensen		Peter

Comment:

We feel this is a very good project and support your efforts! Thank you!

Agency Response:

Thank you for your support of the Prairie Project and management of the Black Hills National Forest.

Letter No:	Comment No:	Resource
6	1	Plan
Hoier		Steve

Comment:

My impression of your Alternatives, including Proposed Actions, is to replace 100 years of mismanagement with more, and probably more destructive mismanagement. It is time to do what is best for the National Forest. This is not Coney Island, Woodstock or Disney World. It's certainly not Rapid City's Central Park. You got the environmental impact correct. Why ignore the impacts to suck up to human needs?

Agency Response:

Your comment about mismanagement of the National Forest has been noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 16
Comment No: 3
Resource: Range
Baldwin Darrel

Comment:

As for grazing allotments the wording and meaning should be to can be adjusted to climatic conditions.

Agency Response:

We concur with your assessment. Livestock numbers or season will be adjusted based on climatic conditions. At this time however, we do not anticipate increasing livestock numbers.

Letter No: 16
Comment No: 4
Resource: Plan
Baldwin Darrel

Comment:

Alternative C is best for fire mgmt, travel mgmt, recreation mgmt. Most effective use of dollars, most economic advantage to the community.

Agency Response:

Thank you for your support of the Prairie Project and proposed (preferred) Alternative C.

Letter No: 17
Comment No: 1
Resource: Plan
Brich Randy

Comment:

The preferred alternative regarding forest thinning using commercial techniques make the best use of the forest resources. Accordingly, I support Alternative C for thinning.

Agency Response:

Your preference for commercial thinning as proposed in Alternative C is noted.

Letter No: 17
Comment No: 2
Resource: Trvl/Rec
Brich Randy

Comment:

Likewise I support Alternative C regarding travel management, as it provides the best compromise between the two groups. Good Luck!

Agency Response:

Thank you for your support of the Prairie Project and Alternative C, the proposed and preferred action.

Letter No: 18
Comment No: 1
Resource: Veg
Kuhnhauser Hank

Comment:

We live on Thunderhead Falls Road. Please consider cutting and removing storm damage from 2 and 3 years ago. Also thinning of trees in this canyon, especially the trees that are in danger of falling on phone, TV cable and electric lines.

Agency Response:

The proposed project includes treatments to reduce storm damage. Some areas were specifically identified in the proposed alternative. Other smaller areas not easily identified will also be treated.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 24
Comment No: 1
Resource: Plan
Gorton Dennis

Comment:

The Pennington County Fire Service Board has reviewed the Prairie Project proposed for the Lower Rapid Creek area. The Fire Service Board at their July 9, 2003, meeting voted to support this project and notify you of their official position. The Pennington County Fire Service Board is supporting Alternative C of the Prairie Project.

Agency Response:

Thank you for your support of the Prairie Project and Alternative C, the proposed and preferred action.

Letter No: 24
Comment No: 2
Resource: Fire/Fuels
Gorton Dennis

Comment:

Life safety is our top priority. We feel it is necessary to aggressively reduce the fuel load in this area. Through the use of aggressive cutting practices and also prescribed burns the overwhelming fuel load located within this area will be greatly reduced without the destruction associated with uncontrolled wildfires. This will assist the local fire service in lowering the risks of wildfire to residential homes located in the Urban Interface.

Agency Response:

Comment is noted. Thanks for your participation and interest in the Prairie Project.

Letter No: 24
Comment No: 3
Resource: Econ
Gorton Dennis

Comment:

Financially, this aggressive approach will substantially reduce the cost of wildfire suppression costs. Fewer structural engines will be needed to provide protection to homes located within this area.

Agency Response:

We agree that Alternative C presents financial advantages to implementing proposed activities.

Letter No: 24
Comment No: 4
Resource: Trvl/Rec
Gorton Dennis

Comment:

The reduction of fuels will make it a safer forest area with more recreation opportunities. Wildlife will benefit from the open areas, providing quality hunting and nature hiking experiences.

Agency Response:

We agree that Alternative C presents advantages to opening up the forest to promote forage and thus encourage wildlife to stay in the area, which makes an enjoyable drive, or hike for those seeking a wildlife viewing experience. Hunters will also find game species in the area.

Letter No: 24
Comment No: 5
Resource: Plan
Gorton Dennis

Comment:

Once again we would like to express our support of Prairie Project Area Alternative C.

Agency Response:

Thank you for your support of the Prairie Project and proposed (preferred) Alternative C.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 25 **Comment No:** 1 **Resource:** Plan

Dakota Territory Cruisers

Comment:

We have studied the documents extensively and in general support alternative "C" which is the preferred alternative of the Forest Service.

Agency Response:

Thank you for your support of the Prairie Project and proposed (preferred) Alternative C.

Letter No: 25 **Comment No:** 2 **Resource:** Fire/Fuels

Dakota Territory Cruisers

Comment:

We are encouraged by the Forest Service's willingness to aggressively exceed the requirements of the Forest Plan to meet the needs of the area with regard to fuel treatment.

Agency Response:

Comment is noted. Thanks for your participation and interest in the prairie project.

Letter No: 25 **Comment No:** 3 **Resource:** Econ

Dakota Territory Cruisers

Comment:

The long term treatment models you have demonstrated (twenty-year) show this alternative to be the most effective and ultimately it generates the most revenue and least amount of deficit spending to accomplish those

Agency Response:

We agree that Alternative C presents financial advantages to implementing proposed activities.

Letter No: 25 **Comment No:** 4 **Resource:** Trvl/Rec

Dakota Territory Cruisers

Comment:

We are equally encouraged by the transportation/access plan of Alternative C and commend your planning in to this end. To us, this a welcome alternative to simply "closing" areas at the completion of the timber side of projects as we have seen so often in the past. Actually, it goes a step further in acknowledging the legitimate uses of the forest for recreation purpose and seeks to develop areas for specific use. While at first glance, it appears we give up some ground, in this instance, we believe we gain much more in the long run. It lines up well from a management standpoint with our desires for an established trail system throughout the Black Hills National Forest. So well, in fact, we think it could serve as a pilot program for the management of the rest of the Forest.

Agency Response:

Recreation is a legitimate use on the Forest. Your support for Alternative C and for establishing a trail system is

Prairie DEIS Public Comment and Agency Response Report

Letter No: 25 **Comment No:** 5 **Resource**
Trvl/Rec

Dakota Territory Cruisers

Comment:

As with all Draft Environmental Impact Statements (DEIS hereafter), it is possible and even probable the final decision made could include elements of each of the proposal alternatives if enough justification warrants the adaption. This is especially true when there are very clear separations of the various intended actions within the plan. This proposal is just such a proposal in that, there are two very clear intents, trave/access management and management of fuels loadings. At the first public meeting, there was some degree of contention by lesser organized groups and individuals regarding separating the two issues and/or switching the preferred actions of the Ranger District to one of the other viable alternatives and we expect that will be commented on in force by the environist groups. We are very concerned about this and would encourage you to not separate the two issues nor "mix and match" during the decision process. We feel alternative C stands well above the other alternatives on

Agency Response:

Your support for Alternative C as proposed is noted. In making a reasoned decision, the deciding officer has the responsibility to consider the legal and regulatory requirements, issues, alternatives, effects disclosed and public feedback. Alternative C is preferred by the agency. Nevertheless refinement and modification of this alternative is possible given the range of public response to the draft EIS.

Letter No: 25 **Comment No:** 6 **Resource**
Range

Dakota Territory Cruisers

Comment:

The only real concern we have with this plan is with regard to verbiage they use when it comes to grazing allotments. It has been pointed out to us by concerned parties that on page 122 of the documents, under the "Range" heading it states: "Livestock numbers and/or length of season can be reduced on an annual basis to adapt to climatic conditions." It has been observed the term "reduced" is slowly replacing the better term "adapted" in official documents and shows an alarming trend in addressing this viable "multiple use" of the forest. We encourage you to address this in the final documents. Use of the term "adapted" is far better in that it allows for increase and reduction based on climatic conditions and "on the ground" needs instead of simply reduction.

Agency Response:

We concur with your assessment. Livestock numbers or season will be adjusted based on climatic conditions. At this time however, we do not anticipate increasing livestock numbers.

Letter No: 25 **Comment No:** 7 **Resource**
Plan

Dakota Territory Cruisers

Comment:

For clarity: we agree with and support the preferred alternative C.

Agency Response:

Your support for Alternative C is again noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 25 **Comment No:** 8 **Resource:** Trvl/Rec

Dakota Territory Cruisers

Comment:

For clarity: we think it is important to recognize recreation as a legitimate use of the forest and to actively plan for it as has been done in alternative C. We encourage you to develop the thought process toward recreation interests to include cooperative efforts with organized recreation groups to develop and established trail system that includes all forms of motorized and non-motorized recreation.

Agency Response:

Thank you for your support of Alternative C. Recreation is a legitimate use on the Forest, and it is important to work with organized recreation groups on a host of recreation issues, including establishment and maintenance of trail systems.

Letter No: 25 **Comment No:** 9 **Resource:** Range

Dakota Territory Cruisers

Comment:

For clarity: terminology should be changed with regard to grazing allotments form "...can be reduced... to can be adjusted".

Agency Response:

See response to Letter 25 Comment 6.

Letter No: 25 **Comment No:** 10 **Resource:** Fire/Fuels

Dakota Territory Cruisers

Comment:

For clarity: we believe feel alternative C gives the most complete short-term and long-term treatment for fire management.

Agency Response:

Support for Alternative C is noted.

Letter No: 25 **Comment No:** 11 **Resource:** Trvl/Rec

Dakota Territory Cruisers

Comment:

For clarity: the best alternative for travel management is found in alternative C and should be chosen regardless of the fire and fuel management alternatives because of its merit in addressing the recreation issues most

Agency Response:

Your support for Alternative C is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
31	1	Trvl/Rec
Andrew		Chet

Comment:

Bob showed a picture of a couch by a fire ring and said it was his "favorite picture" while he was talking about trash dumping in the Victoria area. I had just taken some family who were visiting back home here to enjoy the view of Rapid Creek and the cliffs so I recognized the fire ring in the picture. While at the cliffs, I also observed that someone had thrown some trash off of the cliff. While looking at the picture, I realized that the trash was the couch in Bob's picture. Obviously, since the picture was taken someone has thrown that couch off the cliff. My father and I and others used to deer hunt in that area 40 years ago. Although I hate seeing trash in the hills, (We almost always pick up some trash when we go sight seeing or hiking!) I would hate to see this area closed.

Agency Response:

The majority of recreation users have a strong land ethic and many clean up trash when in the Forest. This attitude and effort is greatly appreciated. Unfortunately, there is a small percentage of people who trash and misuse public lands. Your desire to see this area open to motorized use is noted. It is disappointing to see that the couch had been tossed over the cliff.

Letter No:	Comment No:	Resource
31	2	Trvl/Rec
Andrew		Chet

Comment:

About 15 years ago, I had some health problems and thought I would never be able to hike again. All of a sudden, I was cut off from many of the beautiful places that I liked to visit. I am able to hike again now, but now have a much more tolerant view of people who need motorized transport in order to visit their favorite places. Perhaps a partial solution would be special permits to allow people to drive to certain areas. - Perhaps only for one specific day. For example, I would like to take my mother back to the point behind our ranch that over looks the Strato Bowl. When she was a child, she and some neighbor kids sold hot coffee and sandwiches there to people who came out there on the point to watch the balloons go up. She is 84 years old now and would really treasure a visit to the point. Special use permits would at least give a record of who was in an area. This would certainly cut down on trash dumping while give some people a chance to enjoy places that otherwise they could not.

Agency Response:

Special use permits and other authorizations can be issued for areas that are otherwise restricted from motorized use. This can be done on a case-by-case basis.

Letter No:	Comment No:	Resource
31	3	Plan
Andrew		Chet

Comment:

I would like to close by stating that I am very glad to see the Prairie project moving ahead. It is a good plan!

Agency Response:

Thank you for supporting the Prairie Project.

Letter No:	Comment No:	Resource
32	1	Veg
Davis		Frank

Comment:

Although I now reside in Miss. I am quite familiar with the Black Hills, having served as South Dakota State Forester from Oct. 1986 to June 1994 when I retired. There is no doubt in my mind a great deal more timber cutting, commercial and noncommercial, along with an expanded prescribed burning program is needed.

Agency Response:

Thank you for your comments. Alternative C includes the vegetative treatments you have mentioned.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
37	5	Range
Olson		Jeff

Comment:

Limited grazing before and after burns. Grasses need to get to a certain height to have a hot enough burn to be effective and the forbes need to grow with out getting nipped off early by cows.

Agency Response:

The purpose of the prescribed burns is to reduce the amount of ground fuels, remove some of the ladder fuels, and to raise the minimum tree heights. An increase in forage will probably occur as a secondary benefit. Individual burn plans will be prepared for each of the prescribed burns. Some burn plans recommend that grazing be deferred the year prior to burning. This may affect the entire allotment or just selected pastures. If grass is not the primary carrier fuel for the prescribed burn and it is not a fuel component that is needed or required to meet the management objectives, grazing may not need to be deferred prior to burning. The effectiveness of a prescribed burn is not dependent on grasses being of a "certain" height however. The height of grasses depends on weather, vigor of the plants, soil types, amount of use by all ungulates including elk and deer, etc. Grazing is usually deferred for at least one season following a prescribed burn. The length of the deferral is dependent upon numerous factors including weather, plant recovery, plant vigor and litter establishment.

Letter No:	Comment No:	Resource
37	6	Wildlife
Olson		Jeff

Comment:

Cover and roads. Since there will be very limited cover after the completion of this project, the only way to protect wildlife would be very limited travel. More roads must be closed or more cover must remain. The EIS lists many of the benefits to closing roads. These far out number the reason for keeping them open.

Agency Response:

A wide range of alternative approaches to road closures (seasonal and yearlong) was analyzed and presented in the DEIS. All action alternatives reduce the miles of open road and motorized trails both year-round and seasonally, as compared to the No Action Alternative. The percentage of the Prairie Project area open to off-road motorized use is reduced in action alternatives except for summer-fall in Alternative D (see Table 2-1 of the EIS), also as compared to the No Action Alternative. Commentor's preference for more road closures or more cover is

Letter No:	Comment No:	Resource
37	7	Fire/Fuels
Olson		Jeff

Comment:

We would like to see more patch cuts. There are too many trees and if the BHNF is not going to allow cutting to produce basal areas of less than 60 then we are not accomplishing the fire prevention goals, forbes and grass growth and proper habitat for wildlife.

Agency Response:

Often more than one treatment can meet the same objective on the land. Experience from several large fires has shown that management at a small scale (patch clearcut size) is often not effective in affecting large fire behavior or effects. We need to look at management on a landscape basis. Over 7600 acres or approximately 75% of the treatments proposed in Alternative C would reduce BA less than 60 ft². A forest with this low of BA will have several openings or sparsely timbered areas that would simulate the effects of small patch clearcuts.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
38	3	Fire/Fuels
Borgmeyer		Robert

Comment:

A better defense, in our mind, would be a public/private set of tasks to clear cut a perimeter around private undeveloped land, mechanical thinning of small diameter trees, removal of surface debris, and facilitation of animal husbandry. For example, our ranch (not including the embedded 80 acres) has one half mile of shared fence with BHNH. A partnership could create a "fire-stopping" zone in the Red Zone in order to maximize, at minimal cost, the protection of the residences along Sheridan Lake Road, Red Rocks, Countryside North and Carriage Hills. Enclosed is a June 12, 2003 article from 'The Taos News' describing such a partnership between the Taos Business Alliance and the Forest Service. Your July 2, 2002 letter states the "Private land borders the Prairie Project Area on the east...classic wildland-urban interface". Perhaps this classic requires a new approach. As The Rapid City Journal editorial stated on June 29, 2003: "It's just a matter of time before a major fire erupts west of

Agency Response:

Comment is noted. Protecting private lands is one of several objectives stated in the "Proposed Action and Purpose Of and Need" section on page 3.

Letter No:	Comment No:	Resource
39	1	Trvl/Rec
Loverich		James

Comment:

Recreation Management- National Forest areas near Rapid City where we can enjoy a quiet non-motorized experience are almost non-existent. I totally support Option B or a compromise between Options B and C. Option D would be a huge step in the wrong direction. It is also important to clearly sign and enforce these areas.

Agency Response:

While Alternative B emphasizes non-motorized travel over 80% of the area it is not sensitive to other users needs.

Forest system lands in the Prairie area and adjacent areas already contain large areas restricting off road riding by motorized users through area closures or seasonal gate road closures. This is true to the south in the Battle Creek Fire/TeePee Area, and Norbeck Wildlife Preserve and Black Elk Wilderness, and to the north in the Black Hawk area (seasonal restriction), and Shanks Gulch/Wild Irishman area (seasonal gates). In addition, users are encouraged, in Alternative C, to propose core areas and trail systems to carry out their activities. The responsibility is on the user to propose and create more recreational opportunities for their activity. This is true for motorized and non-motorized users.

Signing like education are the two most important ways to get compliance. Enforcement will assist the latter two ways of informing the public. However, law enforcement by itself is not always effective – users have to be willing to support to help law enforcement resolve issues.

There may be variations to combine Alternatives B and C like there probably is for combining Alternatives B and D or C and D but whatever combination that would result needs to make sense both on the ground and for the public to follow and still meet the needs of the users.

Letter No:	Comment No:	Resource
39	2	Fire/Fuels
Loverich		James

Comment:

Forest Management- I was glad to see Option C taking a somewhat different approach to crown fire control. I live in the middle of Battle Creek Fire which burnt much of the Beagle Timber Sale area. This sale appeared to be primarily focused on commercial logging rather than crown fire potential reduction (take out all of the big yellow bark trees and then leave all of the medium and small trees in the midst of the logging slash). As you know, if you've been through the area, the "thinned" areas burned just as hot or hotter than the untouched areas. I support mechanical thinning and commercial logging where appropriate. However, it must be designed to emphasize a return to the way the forest was before we started to modify it and not so much on shear commercial logging

Agency Response:

Comment is noted. Thanks for your participation and interest in the Prairie Project.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 40
Comment No: 1
Resource: Plan
Miller Don

Comment:

I agree with Alternative Plan C-It looks like a good choice to me, for our area.

Agency Response:

Your support of Alternative C is noted.

Letter No: 40
Comment No: 2
Resource: Fire/Fuels
Miller Don

Comment:

Alternative B- has more controlled burns which is on the south side of our property. Section 18- It is a high crown fire potential.

Agency Response:

Comment is noted.

Letter No: 40
Comment No: 3
Resource: Veg
Miller Don

Comment:

We would like to see more timber harvest and more thinning, as there is a lot of old growth timber.

Agency Response:

Thank you for your comments and your support of timber harvest and thinning.

Letter No: 40
Comment No: 4
Resource: Fire/Fuels
Miller Don

Comment:

The 200 ft. buffer sounds like a very good idea to me.

Agency Response:

Comment is noted. Thanks for your participation and interest in the Prairie Project.

Letter No: 41
Comment No: 1
Resource: Plan
Cressy Densel

Comment:

I agree with your choice of plan C for our area. This looks like a far better choice as far as I am concerned. We live down Brush Creek Road in the Prairie Creek Sub-division. Lots of luck on getting this project completed, I remain.

Agency Response:

Thank you for your support of the Prairie Project and Alternative C, the proposed and preferred action.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
41	2	Fire/Fuels
Cressy		Densel

Comment:

I am wondering if it would be possible to consolidate a part of plan B into plan C. For instance on the south side of our property there is an area that is quite rugged and steep, with quite a little down and tangled timber from the heavy snow fall in April of I believe 2000. It would seem that possibly this area could use a controlled burn, which may be about the only way of getting rid of the fuel.

Agency Response:

Comment noted and considered. Thanks for your participation and interest in the Prairie Project.

Letter No:	Comment No:	Resource
42	1	Plan
Gaines		Robert

Comment:

In review of Plans A-D I favor alternative C. The Prairie Project is a good start, but a very small area is context to the total size of the BHNF.

Agency Response:

Thank you for your support of the Prairie Project and Alternative C. Strong consideration will be given to evaluating and implementing similar proposals in other parts of the Mystic Ranger District and possibly the Black Hills National Forest where conditions and issues warrants.

Letter No:	Comment No:	Resource
42	2	Plan
Gaines		Robert

Comment:

Intro page IV bottom and page V top states. The Prairie Project area fits that description and condition disturbingly well. What is meant by disturbingly? I gather least consequence to negative positives.

Agency Response:

National level initiatives to reduce fuel and fire hazards focus on a number of ecosystems including the fire-adapted ponderosa pine ecosystem particularly in urban-interface settings. This is the ecosystem and setting that applies ("disturbingly well") to the Prairie Project area.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 42
Comment No: 3
Resource: Trvl/Rec
Gaines Robert

Comment:

Table 1-1 149 [MA 8.2 Developed Recreation] recreation seem low - miles of Hwy for recreation May-Dec 186 miles [Table 0-1 and 2-1] appears ok but what is the adjoining open/ckised acreage assicuated wutg tgus road-trail network? As population increases demands for off-road vehicles grow-get out of hand-permits? You state 68% open area to off-road adventures, high? How does this relate of off-road miles?

Agency Response:

Table 1-1 shows the areas within the project area that have been managed for a predominate emphasis. Area 8.2 is located in the Pactola Recreation Complex and as such recreation is what is stressed. The other management areas within the project area are shown to emphasize other key uses but that's not saying that recreation uses are not allowed or considered valuable in those areas. Recreation is a key use throughout the entire project area. Alternative C was devised because it allows the users within the Prairie Project Area to move outside the area and move into areas that match similar recreation uses. An example is the area proposed for year round motorized closure adjoins the area around Pactola Reservoir that also has the same non - motorized recreation opportunities. The area to the north of Highway 44 that is designated as year round motorized use continues at the present time to allow the same experiences as within Prairie Project Area. The same can be said for the area south of the project area. Demand varies because it changes as populations and ages of populations change. As populations get older, non-motorized uses decrease and driving for recreation increases. Alternative C's percentage of open areas allowed for motorized users at 68% is far more realistic when looking at providing both non-motorized and motorized experiences than the current 76% in Alternative A or Alternative D's 85%. Off road use is difficult to measure in linear distances such as miles. Area is a more appropriate method to use and as such in Alternative C is 19,700 acres of the total 29,000 acres within the project area.

Letter No: 42
Comment No: 4
Resource: Veg
Gaines Robert

Comment:

Forests: it is essential to reduced bio-mass- also in order to reduce one must sell (timber co's) product.

Agency Response:

Thank you for your comments and support of a reduction of forest biomass through commercial timber

Letter No: 42
Comment No: 5
Resource: Fire/Fuels
Gaines Robert

Comment:

Prescribed burning in today's environment, very dry, is also very controversial.

Agency Response:

Your comment has been noted. Thanks for your participation and interest in the Prairie Project.

Letter No: 42
Comment No: 6
Resource: Trvl/Rec
Gaines Robert

Comment:

Scenic Areas-dense forest-rock etc. might have to be exempt from certain major thinning practices.

Agency Response:

The purpose and need for the project includes minimizing the potential for catastrophic wildfire. The visual effect of fuels/fire hazard reduction is an important consideration, and will be factored into the decision regarding the Prairie Project. It must be understood, however, that high severity wildfire can have an even more dramatic and long lasting effect on visual resources. It is not possible for the landscape and associated views to remain unchanged over time—natural systems are in a constant state of change.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 42 **Comment No:** 7 **Resource:** Fire/Fuels
Gaines Robert

Comment:

When homeowners build adjacent to Forest Lands perhaps a better set of regs are needed to reduce fire hazards-roofing chimneys covers-plantings-open fires etc. Regulation is a nasty word-best when people with no conscience enter this picture big brother has to appear.

Agency Response:

Comment is noted.

Letter No: 43 **Comment No:** 1 **Resource:** Fire/Fuels
Miller Delmer

Comment:

I live in the Praire Creek Subdivision, located in your Prairie Project area. I am pleased that you are going to proceed with some very necessary work to protect against wildfire. Looking at your proposal, I think Alternative C looks good. But on the South side of Sec 17 & 18 there is an enormous amount of fuel due to the storm in April of 2000. If there was some way to get rid of that fuel, maybe that would Eliminate some of the high fire dangers later. Alternative B shows that area to be better protected based on the 20 year period. I don't know why the planning is different on that area, if there is some way to implement the high fire danger there, it would be a tremendous benefit to us. I am sure that whatever you do will be a great help.

Agency Response:

Support for Alternative C is noted. Fuels reduction needs in your area is being considered.

Letter No: 44 **Comment No:** 1 **Resource:** Trvl/Rec
Perrizo Paul

Comment:

We the following, participate in motorized off road recreation in the Black Hills. We are worried about the continual closure of ares in the Black Hills to off road recreation. Once an area is closed, it is near impossible to regain access to that area. With the growth of off road recreation, we believe that no land should be closed off to road recreation. We are willing to share areas with other forms of recreation such as horse riders, hikers, bicyclists and such to keep as much of the Black Hills open to all forms of recreation. (28 signatures).

Agency Response:

Your concern about continual closures or restrictions on motorized vehicles is noted. It should be understood that the Forest Plan decision issued in 1997 provided guidance for road and off-road (cross-country) motorized use that would change the status quo for the Prairie Project Area and other areas on the Forest. Your willingness to share areas with non-motorized users is noted.

Letter No: 45 **Comment No:** 1 **Resource:** Fire/Fuels
International Mountain Bicycle Association

Comment:

Our Association's opinion is that fire prevention is and should be the primary focus of this EIS Draft. We understand that there is a tremendous threat of catastrophic fires in the Black Hills and accept that aggressive thinning must take place to bring the threat under control. Trusting that Alternative C's approach to fire prevention is the preference of the "fire prevention experts" and that they have the health of our forest in mind, we support Alternative C's approach to thinning and fire prevention.

Agency Response:

Support for Alternative C is noted. Thanks for your participation and interest in the project.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 45 **Comment No:** 2 **Resource**
Trvl/Rec

International Mountain Bicycle
Association

Comment:

Boundaries - Usage corridors with real boundaries are essential and have been addressed, at least for the non-motorized corridor, in Alternative C. Our sole complaint is that we would like a larger area to be considered non-motorized. We would prefer alternative B's near exclusion of motorized use, however, we also understand that that is simply unrealistic as it would alienate a huge number of users. As a compromise, and still allowing boundaries to be clearly defined, we suggest extending the southern border of plan C's non-motorized corridor to Forest Service Road 159. The current corridor in Alternative C is quite narrow and steep, making trail design and

Agency Response:

It is beneficial to have clearly defined motorized and non-motorized boundaries. This makes it easier to designate, sign and enforce restrictions. Page 175 of the DEIS states that the boundaries of existing closure areas can be difficult to determine on the ground. Page 194 of the DEIS states that area closures under Alternative D would be difficult to identify on the ground because they are based on topographic lines and do not follow roads or other easily defined boundaries. Your desire to have Forest Service Road 159 as the southern boundary for a non-motorized cross-country area is noted.

Letter No: 45 **Comment No:** 3 **Resource**
Trvl/Rec

International Mountain Bicycle
Association

Comment:

Increased signage is essential if motorized and non-motorized are to live in harmony. As you know, the progression from singletrack to doubletrack and eventually to 4X4 road is an inevitability of trails in the Black Hills. Currently, any motorized user who decides to "ad lib" can find his way onto any singletrack trail. He cannot know whether it is a motorized or non-motorized trail. (This is partly due to the vague boundaries that presently exist between motorized and non-motorized areas.) There is no defense for these trails from motorized users who "discover" them. We feel that most motorized users would not violate the non-motorized trails, even in the motorized regions, if the trails were signed properly. The signage should be standard throughout the Black Hills so that any visitor or resident would be familiar with the various icons/colors/shapes that signify the appropriate user(s) of any particular

Agency Response:

We agree that maps are unclear and signs on the ground are often non-existent for clear identification of where motorized users should recreate. In Alternative C, users are encouraged to propose core use areas and trail systems to carry out their activities. When core use areas are proposed we plan to clearly identify and direct users to the areas appropriate to their activity. This should help in keeping conflicting uses separate. The Forest is committed to having a signing standard throughout the Forest.

Letter No: 45 **Comment No:** 4 **Resource**
Trvl/Rec

International Mountain Bicycle
Association

Comment:

No ad lib – Ad libbing in the Black Hills will eventually force motorized users out of the Black Hills completely because of the resource damage it has the potential to create. As the number of users increases, so will the damage. We feel that the motorized users, as well as the health of the Black Hills, are best served by confining motorized and non-motorized users to trails and roads. This has already happened with BLM land and probably is not far off for Forest Service land.

Agency Response:

Your desire to have motorized and non-motorized use confined to designated roads and trails is noted. The DEIS includes a range of alternatives. Alternative B greatly reduces the area available for ad-libbing (cross-country) motorized travel.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 45 **Comment No:** 5 **Resource:** Trvl/Rec

International Mountain Bicycle Association

Comment:

Trail Systems - If we could create separate trail systems for motorized and non-motorized (as suggested in Alternative C) mark them thoroughly, map them and market them to surrounding states, then the money that we receive from the commercial loggers is only the tip of the iceberg compared to what tourism could bring in. And if these trail networks would be respected by all of the users, then we would not even need a larger "official" non-motorized area as requested in "A" above. We would simply expand our trail network into the seasonally motorized portion and could even co-exist with the motorized users in the Norris Peak area which is open for motorized use year long.

User fees and/or map pricing would help cover the logging deficit and maintenance of the trails. Further, local user groups could be organized and counted on to assist in clearing the trails after storms and notifying the Forest

Agency Response:

There are benefits to separating at least some motorized and non-motorized trails/road systems. The issue regarding economic benefits from user fees/map sales and tourism is more complicated than that suggested. First, vegetative management and recreation use is not mutually exclusive. Vegetative management activities should not negatively affect tourism and can, under many circumstances, actually support and sustain tourism. The fact that the Black Hills is a managed Forest with a high tourism level supports this position. Second, the amount of funding collected from user fees and map sales under any reasonable scenario is relatively modest compared to the value of forest products within the area. Lastly, under current rules funds collected from user fees and map sales could not be used for fire hazard reduction. We do hope that user groups could be counted on to help with trail clearing and notifying the Forest Service of resource damage along trails.

Letter No: 45 **Comment No:** 6 **Resource:** Trvl/Rec

International Mountain Bicycle Association

Comment:

Policing and Fines - Policing the non-motorized trails both in the non-motorized and motorized corridors would need to improve. Again, clear boundaries for the non-motorized area, as described in "A" above and per Alternative C, would reduce "honest" mistakes by errant motorized users, and consistent signage would further reduce these "honest" mistakes by providing a constant reminder to the user that they are on a motorized trail, or not. For the few recreationalists that still chose to ignore the restrictions and thereby destroy not only the Black Hills National Forest but future opportunities for all of its users, large fines should be levied. Responsible users should be given the jurisdiction to photograph the offending user and send it in to the USFS so that appropriate disciplinary action could be taken.

Maps - Maps of the trail systems, once established, should communicate the policing policy and fine structure as

Agency Response:

Alternative C uses clear road boundaries in broad, large land areas to define restricted areas for motorized travel. Currently, restriction areas are disjointed (7 different areas) over a large area and ridges or topographic features make up the boundaries. Further, maps are not clear to the user on the ground. We agree that good signing on the ground and maps for users would encourage users to pursue their activities in the appropriate place on the forest.

Increasing the fines for illegal actions on the National Forest System lands is a judicial responsibility that the Forest Service has no control. As to posting the fines, law enforcement officers determine what the fine will be when the offense occurs. Each offense for the same violation under different circumstances can change what

Prairie DEIS Public Comment and Agency Response Report

Letter No: 45 **Comment No:** 7 **Resource:** Trvl/Rec

International Mountain Bicycle Association

Comment:

Education –Educating all of the users should begin at the bike shops, ATV stores, information kiosks, chambers of commerce, motorized and non-motorized clubs and among the stacks of tourist attraction brochures offered in most Black Hills communities. Residents and tourists alike should understand by the time they get to the trailheads that we want them to have a great experience while in the Black Hills, but in order to ensure that they and others can enjoy the Hills in the future, these trail signs and usage guidelines need to be observed. They should also understand that other users are policing the area and that hefty fines will be levied against offenders.

Agency Response:

Alternative C uses clear road boundaries in broad, large land areas to define restricted areas for motorized travel. Currently, restriction areas are disjointed (7 different areas) over a large area and ridges or topographic features make up the boundaries. Further, maps are not clear to the user on the ground. We agree that good signing on the ground and maps for users would encourage users to pursue their activities in the appropriate place on the forest.

A partnership with the bike shops and other businesses and organizations where users pick up gear and information is a step in the right direction in getting the word out about proper areas to pursue both motorized and

Letter No: 46 **Comment No:** 1 **Resource:** Trvl/Rec

Edwards Tim and Ryan

Comment:

I am in full support of the attached document from Phil Busching on behalf of the Black Hills Mountain Bike Association. Alternative B is preferred. An expanded Alt. C for non motorized use could work. We need more room to work with 'publicized' trails. The narrow corridor is geographically prohibitive. If we publicize the trails and motorized use is legal, the trails will turn into roads. Signage needs to be greatly increased. The vast majority of the violators of the current closure area are totally ignorant to the fact that it is closed. ONE sign spells the area out and is even wrong information. Fines need to increase GREATLY. A few \$1000 fines would spread real quick amongst our real 'intentional' violators. The fines would support increased policing. I still feel that under the current circumstances or under any plan, motorized and non-motorized travel cannot coexist if the non motorized people really want to enjoy all the amenities of the Black Hills have to offer.

Agency Response:

Alternative B is definitely the preferred choice for most non-motorized enthusiast's. "Publicized trails" as you mention may in fact need to go through areas where motorized vehicles are allowed. Better signing and more patrolling of users are key factors and need to be implemented throughout the entire area. Alternative C uses clear road boundaries in broad, large land areas to define restricted areas for motorized travel. Currently, restriction areas are disjointed (7 different areas) over a large area and ridges or topographic features make up the boundaries. Further, maps are not clear to the user on the ground. We agree that good signing on the ground and maps for users would encourage users to pursue their activities in the appropriate place on the forest. Currently fines are allowable up to \$5000 or 6 months in prison.

Letter No: 46 **Comment No:** 2 **Resource:** Plan

Edwards Tim and Ryan

Comment:

Thanks for moving on this project and especially for listening to everyones input.

Agency Response:

Thank you for your support of the Prairie Project.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
50	2	Trvl/Rec
Petersen		Ross

Comment:

68 signatures - See Letter 44, Comment 1

Agency Response:

Your concern about continual closures or restrictions on motorized vehicles is noted. It should be understood that the Forest Plan decision issued in 1997 provided guidance on off-road (cross-country) motorized use that would change the status quo for the Prairie Project Area. Your willingness to share areas with non-motorized users is

Letter No:	Comment No:	Resource
51	1	Fire/Fuels
Edwards		Tim and Ryan

Comment:

It seems that everyone attending the meetings recently (and everyone I've talked with, including some environmentalists) is in agreement with the forest and timber management plan of proposed action C. A very good presentation was put on by Mr. Robert Thompson; his message was quite clear that this area is in danger of becoming a tinder box. I whole-heartedly agree with the Forest Service's proposed action of aggressively managing and thinning the forest. As Mr. Thompson pointed out, the forest ecosystem really doesn't care whether a crown fire sweeps through or the area is safely managed by humans, the end result is the same. Now, I prefer the latter option, and not just because we reside in such a high-risk zone. I understand your appeals process and how radical environmentalists can slow operations down. This is unfortunate, but I want the Forest Service to know that they have the backing of most of the more informed members of the area.

Agency Response:

Support for Alternative C is noted. Thanks for your participation and interest in the project.

Letter No:	Comment No:	Resource
51	2	Trvl/Rec
Edwards		Tim and Ryan

Comment:

Motorized vehicles have an immensely greater potential to do damage to a forest ecosystem than does foot, horse, or mountain bike travel. If everyone knew how to operate their vehicles responsibly, whether it be a horse, bicycle, motorcycle, ATV, or Jeep, I would not be writing this letter and Travel Management Plans A, B, C, or D would not need to exist. The Forest Service does recognize the increased damage potential of the last three

Agency Response:

Thank you for your comments on the Prairie Project. The Interdisciplinary Team is aware of the resource damage that occurs from all users of the land. Each type of use results in some damage, it is the significance of that damage that makes the need to restrict some uses in some areas.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
51	3	Trvl/Rec
Edwards		Tim and Ryan

Comment:

99% of the motorized vehicle community is well intending. However, I'd say about 80% are uninformed about trail etiquette and environmental effects. I attend school in the populated and outdoor-natured state of Colorado. Recently a large plot of land consisting of excellent mountain bike trails was opened to all motorized travel. I was appalled. However, my cycling peers in Colorado were not. For you see, a mutual understanding exists between the respective trail users. Although occasional head-butting is unavoidable, dirt bikes, ATV's, mountain bikers, and hikers all stay on their respective trails. In the Black Hills we do not have such an understanding. This is because of the relatively low population in the area which also makes the Black Hills such an incredibly unique and beautiful place to live. However, most of the motorized population in the Black Hills does not understand other users' needs. For example, my family observed numerous times when a normal, good natured family or young person is out to enjoy their forest by ATV. They come across a single track and usually think one of two things, singletrack equals challenge or singletrack equals new place to "squeeze" the four-wheeler through and explore. These people are not ill intended, they are simply ignorant. Therefore, education is paramount for mutual understanding between users. My key concern is this: every singletrack in the Prairie Project area will become a wide four-wheeler trail, this is an inevitable fact, and no one can convince me of this otherwise. Action must be taken now to establish easy to understand zones.

Agency Response:

Alternative C uses clear road boundaries in broad, large land areas to define restricted areas for motorized travel. Currently, restricted areas are disjointed (7 different areas) over a large area and ridges or topographic features make up the boundaries. Further, maps are not clear to the user on the ground. We agree too that good signing on the ground and maps for users would encourage users to pursue their activities in the appropriate place on the forest. A partnership with the bike shops and other businesses and organizations where users pick up gear and information is a step in the right direction in getting the word out about proper areas to pursue both motorized and non-motorized recreation on the forest.

Letter No:	Comment No:	Resource
51	4	Trvl/Rec
Edwards		Tim and Ryan

Comment:

The easily legible core user recreational concentration boundaries of proposed travel management plan C is the best course of action for the Black Hills National Forest. This is not about squandering people out of the joy of using the Black Hills, it is about allowing for future opportunities for both parties. Although I would ideally like to see more land closed year-round to motorized vehicle travel, plan C offers a good compromise and very clear boundary lines. I understand the Forest Service has met a great deal of opposition to the proposed action plan. Many motorized users do not understand how greatly their population is growing. They do not understand that in 10 years, things could get so out of hand, that the Forest Service might close everything. If all of the users in the area know what you and I know, and have had some of the experiences that I have had, you would not see such opposition, and I would not be writing this letter. Also, I've observed that plan C will restrict all motorized travel surrounding my father's property. I will not be allowed to ride my ATV beyond our property! This is a sacrifice I am willing to make to preserve opportunities for everyone. As time goes on, more people will come to realize and accept this "sacrifice" for the betterment of travel opportunities for all. Please, keep plan C as is for now. Please do not deviate from your brilliantly drawn up and easy to read boundaries. I hope this trend for managing travel will continue throughout other areas of the Black Hills as well.

Agency Response:

Thank you for your support of Alternative C. Your desire for easily defined travel management boundaries is noted. As stated on pages 175 and 180 of the DEIS, recreation use is expected to grow in this area. There will be tradeoffs involved for all users regardless which action is selected.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
51	5	Trvl/Rec
Edwards		Tim and Ryan

Comment:

With the help of Mr. Phil Busching, I am currently trying to organize a meeting with leaders of the motorized user clubs around the region to talk about how to accommodate each other's needs. Perhaps as time goes on, we will also be able to protect certain singletrack trails in the areas of heavy motorized user traffic. I will contact you later about my thoughts on this.

Agency Response:

Thank you for your support of the Prairie Project and for seeking collaboration with other users.

Letter No:	Comment No:	Resource
52	1	Wildlife
Director		Office of Environmental Policy and Compliance

Comment:

Endangered Species- The US Forest Service has determined that the activities of the Prairie Project Area (lower Rapid Creek Area) will have no effect on bald eagles. The US Fish and Wildlife Service (USFWS) concurs with that determination. However, if a nest is found, no work should take place within 1/4 mile of the nest during the nesting season which occurs from January to August. Any nests found should be reported to the USFWS field office in Pierre at (605) 226-7621

Agency Response:

Thank you for your concurrence on the determination of no effect on the bald eagle. As noted in the DEIS Appendix B (pg. B-12), any raptor nest will be protected through mitigation measures as per Forest Plan Guideline 3204 (treated as a Standard).

Letter No:	Comment No:	Resource
52	2	Hydro
Director		Office of Environmental Policy and Compliance

Comment:

Water Quality- We are concerned about the proposal to dredge the reservoirs at Victoria Dam and Prairie Dam in Alternatives B and C. The DEIS presents very little information about the plans to dredge and gives no explanation about how this dredging activity relates to the other fuels-reduction activities. Specifically, we are concerned that: 1) dredging activities may increase sediment in the water column which could impede the ability of raptors to forage; 2) contaminants may be trapped in the sediments which would be released into the water column during the dredging process; and 3) dredged material may reenter the reservoirs or drain into other water bodies, including wetlands, if not carefully deposited in upland areas.

Agency Response:

The commentator's concern is noted. This project does not relate to fuels-reductions activities, it is a separate project identified during the planning process. Dredging the ponds will have an impact on sediment as noted in the DEIS. It will not impede the ability of raptors to forage because Prairie and Victoria Creeks are not large enough to provide for suitable forage habitat and the sediment will settle out before it reaches Rapid Creek as there are six stream miles to Rapid Creek from the Prairie Creek Dam and five stream miles to Rapid Creek from the Victoria Lake Dam. If there are contaminants in the sediment, most of them will be removed along with the sediment. There is a possibility some could be released with the sediment. Dredge material taken from the lakes will be placed such that the dredged material will not reenter the lakes or streams.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
52	3	Heritage
Director		Office of Environmental Policy and Compliance

Comment:

Cultural Resources- This project should comply with all pertinent laws and regulations, in addition to utilizing the best available science for protection of natural resources. We ask that Native American universal all-risk organized Type II hand crews be used to conduct some of the tasks associated with this project. The methodologies for the treatment of cultural resources, particularly human remains, must be addressed in accordance with the provisions of the Native American Graves Protection and Repatriation Act, the Archeological 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. If a cultural resource survey determines there is a cultural or religious significance for the Native American community, please contact Dr. Carson Murdy, Bureau of Indian Affairs Regional Archaeologist, at (605) 226-7618.

Agency Response:

Forest Service personnel have conducted intensive cultural resource surveys of the Prairie Project Area, to assess the possible effects of the proposed undertaking on heritage resources. The Heritage resource reconnaissance was performed by a professional archaeologist using a system that surveys potentially affected resources within the project area with equal thoroughness. All personnel meet the Secretary of the Interiors Standards for Heritage Resources 36CFR800. This survey is in compliance with the National Historic Preservation Act of 1966, as amended; the National Environmental Policy Act of 1969; Executive Order 11593 of 1971; the American Indian Religious Freedom Act of 1978; and Archaeological Resource Protection Act of 1979. This report is filed in the Black Hills National Forest Supervisor's Office, Custer, South Dakota; and with the State Historic Preservation Office (SHPO), Pierre, South Dakota and is not available for general public review [16 U.S.C. 470hh(a)]. All significant historic and prehistoric properties will be protected by following the heritage resource compliance process mandated by Section 106 of the National Historic Preservation Act (NHPA) and the recommendations outlined in the heritage resource reports.

Federal mandate requires the Forest Service to handle any discovery of human remains with the guidelines of the Native American Graves Protection and Repatriation Act (NAGPRA: [25 U.S.C. 3001]). The method and resources to be used for the accomplishments of tasks associated with these proposed activities have not been decided. The work may be accomplished in-house by Forest Service crews, or may be contracted. The Forest Service operates under contracting regulations that encourages the application of minority groups and small businesses.

Letter No:	Comment No:	Resource
53	1	Fire/Fuels
Pavek		Tim

Comment:

I support the aggressive fire and fuels hazard treatment activities proposed under Alternative C as clearly necessary to reduce the threat of catastrophic wildfire in the project area. A major advantage of this alternative is the use of revenue from more extensive commercial timber harvest to offset the cost of non-commercial thinning. This not only results in the highest benefit-cost ratio of any alternative, but provides the most effective wildfire hazard reduction-more than what could be expected using only appropriated funding. Alternative C also provides the best long-term value and benefit, that being the greatest reduction in potential for a crown fire 20 years after

Agency Response:

Support for Alternative C is noted. Thanks for your participation and interest in the project.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
53	2	Plan
Pavek		Tim

Comment:

I suggest that contract specifications and/or contract management/inspection be adequate to leave the forest floor in better condition than I have observed in some thinning projects. Mitigation measures should include cuttings downed trees and slash sufficiently so it lies on the forest floor, decays as quickly as possible, and minimizes additional fuel loading. It should also include monitoring for treatment of noxious weeds, such as Canadian thistle by herbicides where necessary.

Agency Response:

Activities resulting from the Prairie EIS and Record of Decision will generate slash and woody fuels in addition to existing ground fuels. Management specifications and mitigation measures will facilitate removal or reduction of fuels to a level that significantly reduces the potential for uncontrollable fire spread. Treating and monitoring of noxious and invasive weeds are planned for as part of all Prairie Project activities.

Letter No:	Comment No:	Resource
53	3	Trvl/Rec
Pavek		Tim

Comment:

I support Alternative A with respect to travel management. An important benefit to many users is that it allows off-road motorized use during the winter months when areas off the higher hills are covered with snow. It also allows all of the historical forest uses to continue as they currently are. Alternative D is the second best with the addition of the trail across Victoria Creek in Sections 23 and 24 to maintain the connection between Road 150 and Road 163. However, I also recognize the pressure of increased motorized travel in many areas along with its immediate and long-term negative effects. Therefore, I must reluctantly support Alternate C (AltC), with minor modification, as a necessary compromise. I would like to commend the Interdisciplinary Team for their efforts to incorporate public comments and to balance competing uses. In Chapter 3, the Travel and Recreational Use and Lifestyles sections effectively identify user preferences and issues. The Alt C designation of use corridors with recognizable boundaries is a practical approach to separate users. The center corridor designated exclusively to non-motorized travel is a reasonable compromise. I would be opposed to any increase of the area closed to motorized travel. Alt C proposes travel restrictions over a significantly larger percentage of the project area than identified for the Forest in Objective 422 of the Forest Plan. Furthermore, an area larger than the entire Prairie Project Area, immediately adjacent to the west boundary of the project area, is permanently closed to off-road travel and is available exclusive to non-motorized recreation.

Agency Response:

The Interdisciplinary Team has provided a range of alternatives, and has attempted to balance competing uses in Alternative C. We understand your preferences for selection of other alternatives, and appreciate your desire to compromise. Objective 422 in the Forest Plan is for the entire Forest, and not on a project area basis. These objectives are applied on a management area basis. Alternative D follows these management area objectives for travel management. There is large area adjacent to and west of the Prairie Project Area where off-road (cross-country) travel is restricted. It should also be noted, that there also is a large area adjacent to the Project Area that is open yearlong to off-road motorized use. Regardless of the decision on the Prairie Project, the majority of the Black Hills would be open yearlong to off-road motorized use.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
53	4	Trvl/Rec
Pavek		Tim

Comment:

The expansion of the yearlong closure area east of Victoria Lake is viewed by many local residents I have spoken with as a continuation of what in the early 1990's appeared to preferential treatment for an influential landowner. The closure conveniently provided a buffer zone around a large portion of private property and closed old and well used USFS roads to public use. It is difficult to convince them otherwise after hearing of the following since our meeting last week. At a recent social event, the current landowner in Sections 23 and 26 of the Victoria Closure described the mountain bike trails that had been developed on USFS land adjacent to and originating from his property. There also are good trails available for hiking. He also indicated his preference for non-motorized uses and his displeasure with the cattle grazing under permit on the adjacent forest property. He mentioned that he welcomed mountain bikers and runners he knew to use his property for access to the trails on public land. Under the proposed travel management plan, he will soon be able to offer nearly exclusive use of surrounding public lands to his friends. Unfortunately, my ability to offer similar motorized use opportunities to my friends will be significantly impacted.

Agency Response:

The location of private land within the Prairie Project area is not a factor in whether the area surrounding it will be either motorized or non-motorized. If the property makes a good boundary that is easily located on the ground, it might be used to separate uses. Private property in the hills has a tendency to change hands more frequently than in the past basing management decisions on preferential treatment of one person or group over another regarding travel and recreation uses are not standard practice. As illustrated in the DEIS, roads are used rather than property boundaries to designate our proposed travel management uses.

Letter No:	Comment No:	Resource
53	5	Trvl/Rec
Pavek		Tim

Comment:

The Alt D map opens a portion of the current Victoria Closure in Section 26 that should remain closed for resource protection. The selected Alternative should include this closure. The inclusion of the seasonally open road/trail through Sections 22, 23, 24 and 25 in the SE corner of the center corridor to connect Road 150 and Road 163 is a reasonable mitigation of the negative effects of the area closure. It allows limited motorized access for hunting, berry picking, hiking, and viewing scenery. Request the addition of the 1/2 mile of motorized trail in Sections 25, 26, 27 and 35 to provide a connection from Road 150 in the center corridor to Road 159 in the south corridor.

Agency Response:

Thank you for making us aware of the oversight on the Alternative D map of the permanent closure area below

Letter No:	Comment No:	Resource
53	6	Trvl/Rec
Pavek		Tim

Comment:

The Whispering Pines Water Association, of which I am a board member, has water storage and distribution facilities located on USFS land in Section 25 adjacent to Road 150. During certain times of the year, we use the road daily to monitor operation of the system and perform maintenance. The ability to use this road is critical.

Agency Response:

Administrative use of the closed roads is allowed. In this case the Whispering Pines water association has a valid special use permit with the USFS. Use of Road 150 would be allowed for water monitoring only under this permit.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
53	11	Trvl/Rec
Pavek		Tim

Comment:

There are some areas in which the DEIS does not adequately distinguish between dirt bikes and other motorized vehicles. Negative aspects associated with motorized vehicles are listed as trash dumping, illegal campfires, vandalism, damage to soils and water resources, noxious weeds, and disturbance to wildlife. In general, dirt bikes are no more likely to leave behind trash and start illegal campfires. In general, dirt bikes contribute little more, and sometime less, to the last three than mountain bikes and equestrian users.

Agency Response:

Chapter 3 of the DEIS does list the preference and experience values of dirt bikes as separate from other motorized uses under motorized use (Table 3-28). Recreation Users and their Preferences and Uses in the Prairie Project Area, page 178). The general statement is made that many illegal activities occur from motorized users than we have seen from non-motorized users. This is based on people we have either seen or been informed of by the general public that are doing the actual violations. Motorized users have a higher degree of flexibility to get out of the area than non-motorized users and that is one reason why all motorized users were grouped together. Every user group, more than likely, will contribute to the negative aspects. It has just been documented more

Letter No:	Comment No:	Resource
53	12	Trvl/Rec
Pavek		Tim

Comment:

The DEIS does not present vehicle width restrictions as an option to regulate specific motorized use in any of the alternatives. Areas could be designated where off-road travel is limited to vehicles of less than 36" in width. The DEIS recognizes that dirt bikes and mountain bikes both prefer single track trails. Single track motorcycle trails have been discovered by mountain bikers to provide some excellent riding opportunities. Concurrent use may be considered in some areas in future travel management plans. The DEIS mentions trails historically used for mountain bikes events. There is the perception, and the reality, that the single track trails that have historically been ridden by dirt bikers for decades in some cases are being incrementally "stolen" for the exclusive use of hikers, mountain bikers, and horseback riders. A significant difference between motorized and non-motorized use areas that often goes unmentioned is that motorized use areas do not exclude non-motorized users.

Agency Response:

It is correct that the DEIS does not specifically mention the use of vehicle width restrictions, but such restrictions are compatible with the alternatives presented. For example, Alternative C discusses "Use Areas" where trail systems might be developed. One method for establishing and maintaining the integrity of trails could be through the use of width restrictions. Some of the trail systems now used by non-motorized mountain bikes were likely created by motorized dirt bikes. Concurrent motorized and non-motorized use can and should be considered in many areas. It is understood that areas open to motorized use are also open to non-motorized use.

Letter No:	Comment No:	Resource
53	13	Wildlife
Pavek		Tim

Comment:

Use of the area as critical wintering habitat for big game was identified in the DEIS. If winter habitat for big game is a critical issue, seasonal closure for mountain bike and equestrian uses should be considered. Personal observation and some studies indicate that motorized travel can be less disturbing to some species than non-motorized travel. Improving the habitat by the prescribed forest treatments provides the most significant benefits to big game. The deer, including nearly newborn fawns, don't mind the vehicles and roads when they come

Agency Response:

Consideration has been given to your comments concerning effects on winter range for big game species by allowing non-motorized users (such as mountain bikers and equestrian users) to be within the Prairie Project Area. All users have an impact on big game species during the winter months, even hikers. It depends on the degree of the impact as to what users may be more restricted than others.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
54	2	Hydro
Hilding		Nancy

Comment:

Please provide more information about the DENR's data on Rapid Creek's water quality. Please include in an appendix a report on the number of times the sampling data on the stream's water quality indicated stream did not meet water quality standards for specific parameters during a specific sampling event, even if the average yearly performance was ok. Please especially discuss the TSS and TDS monitoring results for the stream over many years. For example Rapid Creek from headwaters to Pactola was in the 1996 305(b) list for TSS.

Agency Response:

The commentor's request is noted. A detailed listing of water quality samples is not necessary for this DEIS. Listing the samples will tell you what is happening at that point in time at that particular location but will not tell you where or why it is happening. As stated in the DEIS, "...During the present and previous assessment...downstream (of Pactola Reservoir) and adjacent to the Rapid City limits (Rapid Creek) fully supported its assigned uses with elevated water pH and TSS were minor exceedances recorded." In order to get a rating of being 'Fully Supporting', only 1-10% of the values violate standards. This project will not affect Rapid

Letter No:	Comment No:	Resource
54	3	Hydro
Hilding		Nancy

Comment:

Are there past incidences of increased sedimentation in the stream pursuant to timber sale and road building activities? Is there any relation between higher values for TSS or TDS and past timber and road building activities in the Rapid Creek drainage? Please discuss the relation between high TSS or TDS monitoring data and timber sale, road building activities generally in the Forest in SD. Please discuss timber sale activities and sediment and turbidity monitoring values in Wyoming side of the Forest.

Agency Response:

There are no past documented incidences of increased sedimentation in the stream pursuant to timber sale and road building activities. Current concerns are noted and are the CDAs listed in the DEIS and will be repaired with the projects proposed. Any correlation between any TSS or TDS and past timber sales or road building would be pure speculation unless the samples were designed to monitor such activities. This project area does not extend into Wyoming.

Letter No:	Comment No:	Resource
54	4	Hydro
Hilding		Nancy

Comment:

Please survey the Rapid Creek stream bed for sedimentation.

Agency Response:

A survey of Rapid Creek streambed for sedimentation for this project is not needed because it does not tell you where the sedimentation is coming from. Known problems (CDAs) on forestlands have been identified and will be corrected with this project. BMPs will be implemented and will prevent future sedimentation to Rapid Creek.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 54
Comment No: 5
Resource: Wildlife
Hilding Nancy

Comment:

Please talk about the water flow activities of Pactola dam, in respect to the dipper. If you haven't included water quantity data on the stream flow, please include that also. Please discuss the times of year that are most stressful on the dippers. When do nesting or water quality or quantity issues stress them in Rapid Creek? How do your timber sale activities relate to stress times for dippers? Will timber sale sediment, turbidity creating activities be constrained if Pactola is holding back or releasing water in a way to stress dippers? Please discuss the relation of roads and timber harvest to the habitat security for potential nest sites and potential territory for the dipper.

Agency Response:

The American dipper is discussed in the DEIS (pgs. 155-156), including stream flows, threats to habitat, and the effects of the alternatives. Additional discussion of disturbance has been included in the Errata section of the Prairie FEIS.

Letter No: 54
Comment No: 6
Resource: Plan
Hilding Nancy

Comment:

Prairie Hills Audubon Society does not concur with the Forest Services view of the RNV.

Agency Response:

Comment noted.

Letter No: 54
Comment No: 7
Resource: Veg
Hilding Nancy

Comment:

You should maximize aspen stands by expanding stands along their edges, not just maintaining existing aspen stand. Aspen is more fire resistant.

Agency Response:

Alternatives B, C and D include treatments to expand hardwood stands, both aspen and oak. In addition, small groups of hardwoods within larger stands of pine will be enlarged through pine removal to encourage their

Letter No: 54
Comment No: 8
Resource: Fire/Fuels
Hilding Nancy

Comment:

What timber treatments or lack of timber treatments is best for fire resistance is subject to debate. I am enclosing a copy of an article I wrote on this last fall.

Agency Response:

The attached editorial by Nancy Hilding has been read and opinion considered.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
54	9	Plan
Hilding		Nancy

Comment:

Also the RNV is subject to debate. I incorporate by reference the comments I sent in on the Forest Plan Revision on the RNV.

Agency Response:

The subject of Range of Natural Variability (RNV) is an issue that is beyond the scope of the Prairie Project.

Letter No:	Comment No:	Resource
55	1	Heritage

Defenders of the BH / Native
Ecosystems Council

Comment:

Authorization for Activities on Great Sioux Reservation Lands The Forest Service must not once again fail to use the NEPA process to resolve conflicts over resources. Rather, the Prairie DEIS environmental analysis must be used to address the land claims of the signatory tribes to the 1851 and 1868 Fort Laramie Treaties. The 1997 Revised Forest Plan failed to address Native American concerns, and failed to explore alternatives of transferring management authority or Black Hills ownership back to the tribes of the Great Sioux Nation, and also failed to evaluate alternatives based on addressing Native American cultural and spiritual concerns. According to information provided by the U.S. Census Bureau, American Indians are the largest minority population within counties of the Black Hills. Accordingly, this minority population may be disproportionately impacted by the Prairie timber sale. In accordance with Executive Order 12898 and Department of Agriculture Regulation DR5600-2, the Forest Service must therefore fully analyze and assess the effects of the Prairie timber sale to American Indian populations to ensure environmental justice. Such an analysis and assessment should be consistent with the 1997 Council on Environmental Quality report, "Environmental Justice Guidance Under the National Environmental Policy Act." In accordance with this report and direction provided by NEPA and CEQ NEPA implementing regulations, the Forest Service must fully analyze and assess the direct, indirect, and cumulative effects to American Indian populations in and around the Black Hills. Such an analysis and assessment should consider the cumulative economic impacts of the taking of the Black Hills to the Sioux and Arapahoe Indian tribes (see, e.g., United States v. Sioux Nation of Indians, 448 U.S. 371 (1980)), the impacts to American Indian feelings regarding the taking of the Black Hills, the direct and indirect impacts to American Indian religious interests, the cumulative impacts to American Indian religious interests, the cumulative impacts of restricting American Indian subsistence hunting in the Black Hills, the cumulative impacts to American Indian cultural values that have been destroyed through past actions that have been inconsiderate to these values, and the direct and indirect impacts to American Indian cultural values. This must go far beyond the simplistic tabulating of "estimated costs" of alternatives [DEIS at 43]. The Forest Service must fully mitigate any significant direct, indirect, and cumulative effects to American Indian values, interests, and claims in order to ensure environmental justice is achieved. The Prairie DEIS must also fully analyze and assess the potentially significant effects to American Indian sacred sites in accordance with Executive Order 13007. We request that all sacred sites be fully protected. The Prairie DEIS environmental analysis is the proper vehicle to finally resolve these conflicts and to document needed protections to address tribal cultural and spiritual concerns in the sacred Black Hills. Therefore, the Prairie DEIS environmental analysis must: document the source of the Forest Service's alleged jurisdiction to override Treaty provisions that have never been abrogated by Congress; demonstrate how the Forest Service intends to honor the terms of the 1851 and 1868 Fort Laramie Treaties as it proceeds with forest management activities; and base all alternatives on fulfilling the United States' trust responsibility toward the Sioux Nation, including how the Forest Service intends to prohibit actions that would destroy cultural artifacts or desecrate burial or other sacred sites, recognizing that the entire Black Hills area is such a sacred site to the Fort Laramie signatory tribes. The Forest Service must use this public review process, including an appropriate consultation process with the Sioux Tribes for the Prairie project, and to reach an agreement with the Sioux Nation as required by the Fort Laramie Treaties on continued activities (such as logging, grazing, mining, and motorized travel) that degrade the environmental, cultural, and spiritual values of the sacred Black Hills, prior to reauthorizing any commodity or activity program on the Black Hills

Agency Response:

As an agency, the USDA – Forest Service is responsible for administration and management of all Federally owned lands within the National Forest System, including the Black Hills National Forest, in accordance with the statutory direction provided by the Congress of the United States. Congress has not authorized the Forest Service to settle or even address the lands claim issue of the Sioux Tribes. Only Congress has the authority to transfer ownership of the Black Hills National Forest to the Sioux Tribes. Further consideration of the Sioux nation's desire for the return of the lands is a matter of deliberation for Congress. Any potential impacts directly linked to treaty issues and land claims are beyond the scope of the Prairie Project.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 2 **Resource:** Heritage

Defenders of the BH / Native
Ecosystems Council

Comment:

Impacts to Sacred Sites - The most obvious indication that the Forest Service failed to comply with the Executive Order on Sacred Sites is that the Forest Service entirely fails to analyze and assess potentially significant effects to sacred sites in the Prairie DEIS. Nowhere does the Forest Service actually analyze and assess the impacts of the proposed logging and roadbuilding activities to sacred sites. Indeed, we are informed only that "Existing information about heritage and cultural values may often be inadequate" [DEIS at 209] and that "No TCPs were identified within the Prairie Project Area during this analysis" [DEIS at 204]. In place of required analysis, we find merely the definitions of the terms "heritage resources" and "SHPO" in the Glossary. While this lack of analysis is glaring, it is to be expected since the Forest Service failed to obtain and present any inventory data on sacred sites. Without inventory data, it is impossible for the Forest Service to adequately assess existing conditions (i.e., the affected environment) and analyze and assess potentially significant impacts to sacred sites in accordance with 40 CFR § 1502.16. The failure to analyze and assess the potentially significant effects to sacred sites shows the Forest Service failed to take a "hard look" at the impacts of the proposed actions and failed to ensure compliance with the Executive Order on sacred sites.

Agency Response:

The ability to identify and protect sacred sites is heavily dependant on tribal representatives sharing information with the Forests. The heritage resource specialists can and do identify cultural material but it is critical for the tribes to provide cultural information. The Forest has been made aware of sacred sites on other parts of the Forest and is currently protecting these types of sites Forest-wide. It should be noted that the within the preservation laws and regulations that guide management, the terms sacred site and Traditional Cultural Property (TCP's) refer to two distinct categories of sites. TCP's are formally documented sites using criteria defined in the Secretary of Interior's Bulletin #38. To formally document and protect a TCP, extensive oral history specific to that site must be collected and documented. There are a number of criteria that documentation must adequately address in order for a site to be classified as a TCP. Sacred sites do not require the same level of documentation. As mentioned above, six stone cairn sites in the Prairie project area, which may contain sacred qualities, are to be avoided and protected.

DEIS Page 204..."No TCP's were identified"... refers to the fact that tribal governments have not made us aware of potential TCP sites, as defined in Bulletin #38, at this time.

DEIS Page 209....."Existing Information about heritage and cultural values may often be inadequate"...refers to the reluctance of tribal representatives to share sensitive information. The Forest is sensitive to this issue, and is aware that in the past the knowledge of Native American people has been exploited or resulted in undue attention paid to a site by the public. As discussed above heritage specialists depend on tribal representatives to come forth and provide the Forest with cultural information that will allow them to identify and protect cultural sites.

The Forest consults with the South Dakota and Wyoming State Historic Preservation Officers (SHPO's) on the inventory, evaluation, and protective measures, for each undertaking. The Forest also consults with the Tribal Historic Preservation Officers (THPO's) from the Standing Rock Sioux Tribe and Cheyenne River Sioux Tribe in the same manner and with the same documentation for each undertaking. If a site is eligible or has been identified as a sacred site heritage personnel consult with tribal government officials and the appropriate SHPO on protection, avoidance or mitigation measures. As part of the consultation process heritage personnel request field visits by tribal government representatives to identify or verify sacred site locations.

For the Prairie DEIS an intensive heritage resource inventory of all areas to be disturbed was conducted and the report was submitted to the SHPO and THPO offices for review in the fall of 2002. The draft Prairie DEIS was mailed to tribal governments for review and comment in 2003. The Heritage Resource Department on the Mystic Ranger District conducted follow-up phone calls to 33 Native American contacts on the scoping list. The caller either talked directly to the individuals or left messages. Also, the caller asked if the contact had received the Prairie DEIS, and if there were any questions or concerns that they would like to discuss and document for the

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	3	Social

Defenders of the BH / Native
Ecosystems Council

Comment:

Civil Rights- Title VI of the Civil Rights Act of 1964 states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Section 601 of the Civil Rights Act, 42 USC § 2000d. The Supreme Court has held that Section 601 of Title VI "forbids the use of federal funds not only in programs that intentionally discriminate but also in those endeavors that have a disparate impact on racial minorities." *Guardians Association v. Civil Service Commission*, 463 U.S. 582 (1983) (emphasis added). The Court further held that "...those charged with enforcing Title VI ha[ve] sufficient discretion to enforce the statute by forbidding unintentional as well as intentional discrimination." *Guardians*, 592. The Forest Service is a Federal agency charged with enforcing Title VI of the Civil Rights Act of 1964. Indeed, the USDA has promulgated regulations to ensure its agencies comply with and enforce the Act. The regulations state: "No agency, officer, or employee of the United States Department of Agriculture shall, on the ground of race, color, religion, sex, age, national origin, marital status, familial status, sexual orientation, or disability, or because all or part of an individual's income is derived from any public assistance program, exclude participation in, deny the benefits of, or subject to discrimination any person in the United States under any program or activity conducted by the United States Department of Agriculture."

7 CFR § 15d.2(a). Therefore, the Forest Service has a clear duty to ensure people who are impacted by its programs are not intentionally, as well as unintentionally, discriminated against and to ensure minorities do not experience disparate impacts from the implementation of Forest Service programs. Accordingly, the Forest Service has a responsibility to ensure the implementation of proposed logging and roadbuilding activities does not pose disparate impacts to minorities and does not discriminate against people – intentionally or unintentionally – on the basis of their race, color, or national origin. However, the Forest Service failed to do so. Not only did the Forest Service fail to ensure the logging and roadbuilding activities do not discriminate against or pose disparate impacts to American Indian populations, communities, and individuals, but the agency failed to make any reasoned and informed consideration of the relationship between the Forest Service's program of Black Hills National Forest management and the civil rights of American Indians. While such a lack of consideration toward American Indian civil rights may be construed as "an oversight," it is quite clear that the Forest Service's dismissive attitude toward civil rights in the development of the Prairie DEIS perpetuates discrimination against American Indians.

Agency Response:

There is no evidence that the Prairie Project would have any effects to civil rights. The Prairie DEIS was mailed to approximately 380 individuals, groups, and other Federal agencies, including tribal governments for review and comment on June 6, 2003. On July 10, 2003, the District conducted follow-up phone calls to 33 Native American contacts on the scoping list. They were asked if the contact had received the Prairie DEIS, and if there were any questions or concerns that they would like to discuss and document for the record. Two public meetings were also held: June 24, 2003, Johnson Siding Community Hall and July 10, 2003, Whispering Pines Volunteer Fire

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	4	Social

Defenders of the BH / Native
Ecosystems Council

Comment:

Civil Rights Impact Analysis-The Forest Service is required by FSM to complete a civil rights impact analysis for environmental or natural resource actions as "part of the social impact analysis package in a necessary environmental impact statement." FSM 1709.11 § 31.11. However, within the Prairie DEIS, there is no mention, let alone detailed discussion, of civil rights. This omission is especially egregious since civil rights issues were raised by numerous members of the public, and several Sioux Tribes explicitly informed the Forest Service of resolutions that they had adopted calling for protections for specific areas like Norbeck and Beaver Park, and for the entire Black Hills National Forest to be considered as a sacred and cultural site. The Forest Service has a duty to ensure its actions do not discriminate against or pose disparate impacts to American Indians. Rather than the required analysis, we are flatly, and incorrectly, informed that: "No civil rights effects associated with age, race, creed, color, national origin, or sex have been identified." [DEIS at 217]. The fact that the Forest Service's social impact analysis in the Prairie DEIS entirely failed to discuss civil rights is entirely indicative of a failure to ensure compliance with Title VI and USDA Regulations. The failure of the Forest Service to consider whether the Prairie timber sale may intentionally or unintentionally discriminate against American Indians is further egregious in light of claims that the current forest management is discriminatory. The Forest Service adopts the Office of General Counsel's review of treaties, concluding incorrectly that the infamous and unlawful Act of 1877 opened the Great Sioux Reservation to white settlement. However, such a discussion has nothing to do with assessing whether or not the timber sale program, including actions taken to "protect" private inholdings, is discriminatory. The failure of the Forest Service to give any adequate consideration toward its logging practices is essentially discrimination and has failed to ensure civil rights are not violated. The agency's failure to take any affirmative action on a claim of civil rights violations is nothing short of an abrogation of responsibility and an admittance that the Forest Service has no intention of ensuring compliance with Title VI and USDA Regulations.

Agency Response:

Civil rights impact analysis is completed at the Forest Plan level; see the Final Environmental Impact Statement for the Black Hills National Forest 1996 Revised Land and Resource Management Plan.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 5 **Resource**
Social

Defenders of the BH / Native
Ecosystems Council

Comment:

Environmental Justice-The Forest Service failed to achieve Environmental Justice for American Indians in accordance with the Executive Order on Environmental Justice. Executive Order 12898 is cited, but environmental justice concerns are summarily dismissed: “[N]o alternative resulted in any identifiable effects or issues specific to any minority or low-income population or community. The agency has considered all input from persons or groups regardless of age, race, income status, or other social and economic characteristics” [DEIS at 217]. The Forest Service failed to understand and respond to American Indian needs, concerns, and values, failed to adequately analyze and assess the potentially significant impacts to American Indian populations, and failed to rigorously explore and objectively evaluate alternatives that respond to American Indian needs, concerns, and values and that achieve Environmental Justice. Indeed, the Forest Service adopts the recommendations of local Counties (entities which have no legitimacy under the Fort Laramie Treaties) and Euro-Americans to support extensive logging within ½ mile of “private residences”, rather than enforcing the treaty obligations to remove these illegal occupiers of Great Sioux Reservation lands reserved for the exclusive use of the Sioux Nation. As a result, the Forest Service failed to ensure implementation of the proposed actions would not pose disparate impacts to American Indian populations, communities, and individuals in violation of Title VI and USDA Regulations.

Agency Response:

There is no indication that Rapid City, a community with a population of 59,607 residents in 2000, has a significant minority population. There is no indication that the community has a significant low-income population. The minority and low-income population indicators for Rapid City do not exceed CEQ threshold values, and the characteristics for this community do not differ by more than 5 percent from any indicators of Pennington County and, differ in South Dakota more than 5 percent from only the minority indicator. It is unlikely that a project completed in the area surrounding Rapid City would likely have disproportionate negative impacts on any low-income populations. Based upon the review of demographic characteristics of the population of Rapid City and how they compare with suggested threshold levels for concern, there is little reason to immediately suspect that this community might fall under the provisions of Executive Order 12898. For further information on Civil Rights and Environmental Justice, see the Final Environmental Impact Statement for the Black Hills National Forest 1996 Revised Land and Resource Management Plan.

Letter No: 55 **Comment No:** 6 **Resource**
Econ

Defenders of the BH / Native
Ecosystems Council

Comment:

Discrimination Against American Indians-The Forest Service’s analysis of the economic impacts of the proposed actions entirely fails to distinguish economic impacts upon American Indians. In fact, the entire economic analysis is limited to impacts on the white settlers now trespassing on the Great Sioux Reservation. The agency failed to recognize the economic circumstances of American Indian populations, especially those on reservation lands, and therefore discriminated against American Indians in its economic analysis.

Agency Response:

The analysis provides a relative comparison of costs and revenues associated with activities occurring in the Prairie Project area (DEIS, Economics Section, page 217).

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 7 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Viable Populations of Species - The Black Hills Forest Plan employs a "proxy on proxy" approach to meet the requirement of maintaining viable wildlife populations. First, a number of "management indicator species" were selected to represent the needs of various types of wildlife throughout the Forest. For example, the pygmy nuthatch, black-backed woodpecker and three-toed woodpecker were selected to represent a wide-range of species dependent on mature forest conditions in general, and snag habitat in particular. By monitoring the health of the bird populations, the health of a wide range of other species that use similar habitat would be monitored as well. In this way, these birds act as indicators, or proxies, for many other species. The indicator species approach is the first level of proxy.

Next, rather than actually monitoring the population of each indicator species to determine if viable populations are being maintained, the Forest Service designates certain types and quantities of habitat as sufficient to maintain viable populations of the selected indicator species. Then habitats used by MIS will be monitored to determine what population changes, if any, are induced by management activities. For example, the suitable pygmy nuthatch habitat occurs in mature ponderosa pine communities having 3-5 snags per acre in excess of 19 inches dbh. The Forest Plan sets out detailed and exacting requirements for various categories of forest stands (stand density, snag density, big game hiding and thermal cover, etc.). In order to support the minimum viable population of pygmy nuthatches, the Forest Service must determine how many blocks of mature ponderosa pine forest containing 3-5 large snags per acre exist on the Forest. These blocks of habitat are the second level of proxy, each potential breeding block "counting" as the presence of a certain number of breeding pair of pygmy nuthatches, which in turn indicates (in theory) the presence of numerous other species that share similar habitat needs. This is the second level of proxy.

But the Black Hills National Forest doesn't even monitor the second level of habitat conditions necessary for minimum populations. Instead, it further correlates stand conditions with habitat conditions through a completely unvalidated and scientifically indefensible computer matrix multiplication process known as HABCAP. This "proxy on proxy on HABCAP" process is totally inadequate to meet the viability requirements of the National Forest Management Act. That even the proxies are not monitored makes the entire species determination process on the Black Hills National Forest a total fraud, not even qualifying as "junk science". This inadequate procedure must be abandoned, and actual monitoring of wildlife populations begun on the Forest. Until a new methodology for maintaining viable wildlife populations is demonstrated on the Black Hills National Forest, it would be unlawful to further weaken any Forest Plan wildlife standards. Rather, the Prairie DEIS environmental analysis should be seen as the wonderful opportunity it is to finally comply with wildlife laws and regulations on the Black Hills.

The Prairie DEIS must go well beyond the mere definition of "viable population" provided in the Glossary: the environmental analysis must provide specific direction relating to maintaining viable populations of species. This direction must be scientifically supported within the Prairie DEIS, must provide adequate information and analysis to support the effects determinations for sensitive species, and must not rely solely on habitat capability changes as a means to make effects determinations. Rather, the Prairie DEIS must:

- § ensure high to moderate capability habitat for sensitive species is well distributed on the project Area;
- § provide species-specific discussion of snag standards and the effects of forest management to snags and snag dependent species of wildlife;
- § make viability determinations supported by species-specific discussions of critical habitat features, actual populations, and habitat distributions in order to meet the requirements of the NFMA and its implementing regulations;
- § provide habitat capable of supporting well-distributed populations of native vertebrate species across the planning area;
- § present a fragmentation analyses for those species where fragmentation effects are suspected or known to affect the species;
- § protect existing old growth habitat, and provide direction that allows more younger forest stands the chance to attain old-growth conditions;
- § abandon any proposal to construct or reconstruct roads in the project area; and
- § ensure compliance with the NFMA and its implementing regulations with regards to the diversity of plant and animal communities and species viability.

If a fragmentation model is used, the model must assess the effects of fragmentation in terms of more than one spatial scale and one set of criteria in order to adequately assess the effects of fragmentation. In addition, the Forest Service must reduce the road density by prohibiting new road construction and obliterating

Agency Response:

Regulations at 36 CFR 219.19(a)(1) state "certain vertebrate and/or invertebrate species present in the area shall be identified and selected as management indicator species." Regulations at 36 CFR 219.19(a)(6) state "Population trends of the Management Indicator Species will be monitored and relationship to habitat changes determined." Monitoring protocols have been developed (US Forest Service 2003), as directed by the Forest Plan (pgs. IV-1 through IV-7) for all Management Indicator Species (MIS), as well as numerous habitat components such

Prairie DEIS Public Comment and Agency Response Report

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environmentally-damaging existing roads, and by allowing natural processes such as fires and insects to provide their full ecological benefits.

Letter No:	Comment No:	Resource
55	8	Wildlife

Defenders of the BH / Native Ecosystems Council

Comment:

Management Indicator Species (MIS)-Once again the Prairie DEIS provides a definition of "Management Indicators" in the Glossary [DEIS at 246], but absolutely no population data are presented. Instead of gathering and analyzing the required monitoring data, the DEIS merely regurgitates the regulations they are flouting: "Population trends of Management Indicator Species will be monitored and relationships to habitat changes determined" [36 CFR 219.19(a)(6) citation at DEIS at 144, emphasis added]. The required monitoring and determination of relationships has not yet been done anywhere on the Black Hills National Forest. Moreover, the Prairie DEIS must evaluate the current viability of MIS on the BHNH, not merely conduct an effects analysis to existing MIS populations. Rather, the Forest Service must determine if viable populations currently exist for the purposes of establishing MIS population and habitat goals as required by the Chief's Forest Plan appeal decision. The EIS must fully analyze and assess the potentially significant effects to all MIS and their habitat that may exist within the Prairie timber sale area. The final EIS must include and present quantitative MIS population trend data in order to accurately analyze and assess all potentially significant effects to MIS populations. Special attention must be given to the brown creeper as this bird species is an indicator of dense mature and late successional forest, a habitat type that has declined precipitously on the BHNH and now exists in very isolated and sparse stands on the forest. To accomplish this evaluation of MIS viability, the Prairie DEIS must: develop and implement a species-specific monitoring plan with quantified goals and objectives for MIS and sensitive species and their habitat; document what habitat exists within the project area for the pine marten, including pine habitat; document the cumulative effects of meadow dewatering and draining on eliminating beaver from the project area, and the associated aquatic habitat for native fish species that has been lost clearly articulate the role of MIS in project analysis; develop a hard list of MIS so as to ensure MIS are not excluded from analysis; MIS for which the project area is asserted to provide no suitable current habitat must be fully evaluated from the cumulative effects perspective on loss of historical habitat due to the exploitation of the natural resources of the Black Hills; establish a clear link between project-level MIS analysis and forest-wide population monitoring; develop quantitative MIS population goals and ensure project-level activities do not jeopardize these goals; provide information and analysis that supports the designation of MIS; must designate fish, wildlife, and plant MIS; must select and monitor MIS in accordance with NFMA regulations and FSM direction; and must provide documentation that describes how high, moderate, and low habitat capability is determined before using any HABCAP analysis. If MIS from the original LRMP are not designated, the Prairie DEIS must document why these MIS are not designated. For those MIS excluded from evaluation because of alleged lack of habitat, the EIS must provide a comprehensive review of the cumulative effects on the Black Hills that produced this loss of habitat.

Agency Response:

As stated on pg. 144 of the Prairie DEIS, the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press) present results of annual monitoring activities, including population estimates for some species. Viability of MIS on the Black Hills National Forest is beyond the scope of the Prairie Project (36 CFR 219.19). All MIS that occur or are suspected to occur in the Prairie Project Area were analyzed and discussed in the Prairie DEIS (pgs. 144-154). Monitoring protocols have been developed (US Forest Service 2003), as directed by the Forest Plan (pgs. IV-1 through IV-7) for all Management Indicator Species (MIS), as well as numerous habitat components such as late succession, snags, down woody material, etc. The American marten is addressed in the Prairie BA/BE. Beaver, riparian habitats, and hardwood habitats are discussed in the Prairie DEIS (pgs. 139-142). Parrish et al. (1996), as referenced on pg. 139, includes a more extensive discussion as late succession, snags, down woody material, etc. Results of monitoring activities are published annually of beaver decline in the Black Hills. There is no evidence that habitat for MIS species excluded from detailed analysis (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). Budgetary constraints may limit monitoring analysis (mountain goat [an introduced, non-native species], finescale dace, and lake chub) has been lost from activities in any given year to those required by law or regulation. This year is the third year the Forest has the Prairie Project area; rather it appears never to have existed, at least within recorded Black Hills history. There contracted with the Rocky Mountain Bird Observatory to provide statistically rigorous, long-term population trend are no

requirements to set population goals for MIS species. Designation of MIS is beyond the scope of the data on most diurnal, regularly breeding bird species in the Black Hills. Addressing Forest planning-level issues of DEIS (36 CFR 219.19(a)(1)).

Prairie

population viability, the validity of the HABCAP model, and fragmentation are beyond the scope of the Prairie Project. Reference is made to the fragmentation discussion in the Revised Forest Plan FEIS (pgs. III-247 through III-275). Refer to the Biological Assessment/ Biological Evaluation (BA/BE) for analysis and effects determinations for all sensitive species that occur in the project area, or for which potentially suitable habitat occurs. HABCAP is not used at all in the analysis of or determinations for sensitive species. Late successional habitats and the effects of the alternatives are discussed in the Prairie DEIS (pgs. 134-135). Snags and the effects of the alternatives are discussed in the Prairie DEIS (pgs.135-138). Roads, travel management, and the effects of the alternatives as related to wildlife and habitat are discussed in the Prairie DEIS (pgs. 163-169).

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 9 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Snag-Dependent Species - The Prairie DEIS environmental analysis must terminate the “bad mouthing” of natural processes such as insect outbreaks and storm damage that has led to the public hysteria surrounding fire danger on the Black Hills National Forest, which is primarily a function of weather conditions such as ongoing drought. Rather, the Prairie DEIS must provide population trends for snag dependent species to provide a context for the impacts of forest management to snag densities taking into consideration the “current age and structure of the forest” and any other natural or human-caused impacts to snag densities. Mountain pine beetle infestations, if left alone, lead to the creation of snags and consequently the existence of down woody debris. These habitat components are essential to the survival of many native species on the Black Hills. We therefore request the final EIS fully analyze and assess how the Prairie timber sale will affect snag habitat and down-woody debris habitat, as well as snag recruitment and the creation of future down-woody debris. Such an analysis and assessment must consider the fact that certain native species depend upon large-diameter snags and large diameter down-woody debris. The DEIS alerts us that: “no snag surveys have been conducted in the Prairie Project Area to determine snag densities because it is assumed that Prairie... is deficient in snags and does not meet Forest Plan direction for snags” [DEIS at 136, emphasis added]. Yet nowhere in the assessment of impacts to snag-dependent species does this assumed lack of existing snags raise any concerns within the Forest Service. Apparently, the Forest Service couldn’t be bothered to actually collect any field data on existing snags, but instead is content to present to the public the unvalidated outputs of “rosy scenario” computer programs that fail to meet the professional and scientific mandates of NEPA. For example, we are informed “Alternative A [No-Action] will provide fewer snags over time than Alternatives B and C” [DEIS at 137], despite the admission that “all action alternatives decrease the number of existing green trees/acre average available for snag recruitment compared to Alternative A” [DEIS at 42]. No explanation is provided as to why these fewer, less-stressed trees will produce higher mortality than the No-Action Alternative, despite the recorded continuing decline of snags forestwide with the ongoing shelterwood program of actions such as those proposed for the Prairie project area.

The snag recruitment assumptions presented in the Prairie DEIS must be discarded as more of the “digital apologists” that have been proclaiming that logging will enhance long-term habitat characteristics on the Black Hills.

This junk science began with the rosy projections in the 1983 Forest Plan that logging of “decadent” over-mature stands would lead to such increased vigor that ever-increasing timber harvest levels would ensue. This, of course, is without scientific merit. We urge the Forest Service to carefully review appeal(s) of the 1997 LRMP and the Phase I Amendment for more realistic determinations of needed green tree recruitment levels. In addition, the Prairie DEIS environmental analysis must: present actual soft snag densities on the project Area and explain how these densities were calculated; ensure an adequate density of soft snags is provided; ensure sufficient large diameter snags for snag-dependent species such as the northern flicker, black-backed woodpecker, three-toed woodpecker, Lewis’ woodpecker, common flicker, and pygmy nuthatch are provided across the project Area; provide snag diameter requirements for all snag dependent species to ensure the USFS is protecting snags of adequate diameter; present snag height requirements for all snag dependent species in order to adequately support any adopted snag height requirement; ensure sufficient snag densities for snag-dependent species such as the black-backed woodpecker and common flicker are provided across the project Area; provide snag density requirements for all snag dependent species to ensure the USFS is providing an adequate density of snags; establish a sufficient snag density standard that meets the documented needs of snag-dependent species of wildlife on the project Area in order to ensure snag dependent species viability on the BBNF; provide the required information and analysis to support any snag density standard that is developed for any proposed Forest Plan amendments; and establish soft snag retention standards for the Lewis’ woodpecker and other snag dependent species of wildlife in order to ensure viable populations of these species (these retention standards must take into consideration the needs of the Lewis’ woodpecker and other snag dependent species of wildlife). This information must be presented in the Prairie DEIS environmental analysis. In addition, the Prairie DEIS environmental analysis must provide information and analysis to support the adequacy of any HABCAP or FVS analysis completed for

Agency Response:

Snag habitat is addressed in the Prairie DEIS (pgs. 135-138), and additional data from the detailed analysis completed is held in the project file. Cavity-dependent sensitive species are addressed in the Prairie BA/BE (also located in the project file). The Forest has contracted with the Rocky Mountain Bird Observatory to provide statistically rigorous, long-term population trend data on most diurnal, regularly breeding bird species in the Black Hills, including snag-dependent species. However, since this monitoring program is only in its third year, it is too soon to assess whether population sizes are changing, and if so, whether trends are positive or negative. It will take several years before any conclusions can be made from data collected. Down woody material and habitats are addressed in the Prairie DEIS (pg. 138). The assumption that the project area is deficient in snags is a legitimate and logical assumption in that it is based on surveys that have been conducted in numerous other project areas on the Mystic District in the past decade (data held in District files). The snag analysis procedure (USDA Forest Service 2002c) completed for the Prairie DEIS is a Forest-level issue beyond the scope of the Prairie project. As stated in the Prairie DEIS on pg. 137, Alt. A will produce fewer snags than Alt. B or Alt. C over time because there is no prescribed burning to create snags in Alt. A. Although all action alternatives decrease the

Prairie DEIS Public Comment and Agency Response Report

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snag dependent species of wildlife.

Letter No: 55 **Comment No:** 10 **Resource**
Range

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS environmental analysis must fully analyze the effects of livestock grazing to sensitive plant species, and must provide and/or cite information and analysis that supports any conclusions regarding the effects of livestock grazing to sensitive plant species. There is no need to develop water resources for cows. Proposals to steal water from fish and wildlife only underscores the need to reform grazing on public lands and underscores the fact that livestock grazing is not sustainable on public lands.

Agency Response:

Comments noted. Livestock grazing is an authorized use of the Black Hills National Forest. The issue of Livestock grazing is not part of the decision to be made for the Prairie Project.

Letter No: 55 **Comment No:** 11 **Resource**
Hydro

Defenders of the BH / Native
Ecosystems Council

Comment:

The assessment must also go far beyond the generalities presented in the DEIS: "Riparian communities, water quality, and fisheries habitat in the Prairie Project Area are currently negatively affected by improperly located and constructed roads, illegal motorized traffic, livestock grazing, heavy recreational use of some areas, and the increasing density of the adjacent pine community" [DEIS at 41]. A mere (partial) listing of actions and associated impacts does not meet the disclosure requirements of NEPA, even if the list would be expanded to include past logging as the source of most of these negative effects. The final EIS must fully analyze and assess the potentially significant effects to water quality both within the Prairie timber sale area and downstream from the timber sale area to ensure compliance with the Clean Water Act, State Water Quality laws, and Executive Orders 11988 and 11990. The final EIS must fully analyze the effects of the Prairie timber sale on sedimentation, flow regimes, water temperature alterations, and streambeds and banks. When analyzing the effects of the Prairie timber sale to water resources, the Forest Service cannot simply rely on a list of best management practices ("BMP's") in place of analysis, disclosure, and assessment as required by the National Environmental Policy Act. For instance, if sedimentation will occur as a result of the timber sale, the agency must analyze and disclose how much sedimentation will occur in order to adequately assess the significance of any and all sedimentation. A mere listing of BMP's is a wholly inadequate assessment and does not provide the public or the agency with any kind of understanding of the potentially significant effects of the Prairie timber sale to water resources.

Agency Response:

The water resource is being protected by the implementation of BMPs. Best Management Practices are forest management practices, developed pursuant to federal water quality legislation, to minimize or prevent nonpoint alternatives greatly exceed Forest Plan direction (one large green tree/acre, Guideline 2306, treated as a Standard) source water pollution and are used to achieve water quality standards. By implementing the BMPs, the Prairie project is in compliance with the Clean Water Act, State Water Quality laws and Executive Orders 11988 and west-facing slopes, respectively. Hard snags with live sapwood and heart rot are preferred by most cavity-nesting species, although a few species weakly adapted for excavating, like the red-breasted nuthatch and black-capped chickadee, use soft snags (USDA Forest Service 1996). Forest Plan Guideline 2305 (treated as a Standard) provides direction to retain all soft snags unless determined to be a safety hazard. This guideline, combined with Forest Plan direction for hard snags, is expected to provide snag numbers adequate to support cavity-nesting species. Establishment of a snag density standard and species viability are beyond the scope of the Prairie project. HABCAP is not used to analyze habitat for snag-dependent wildlife.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 12 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

The final EIS must fully disclose the existence, extent, and vegetative composition of all riparian areas within the Prairie timber sale and fully analyze and assess the potentially significant effects to these riparian areas. The revised EIS must disclose the existence of riparian areas on maps included with the Prairie timber sale analysis area and provide information documenting the vegetative composition of riparian areas in the timber sale area.

Agency Response:

Riparian communities and the effects of project activities are addressed in the Prairie DEIS (pgs.139-140). Complete floristic surveys of riparian areas were conducted during plant surveys of the Prairie Project Area in 2002. Results of the surveys, including maps, can be found in the project file.

Letter No: 55 **Comment No:** 13 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

The final EIS must fully disclose the location and extent of all historic meadows, including wet meadows supporting beaver colonies, in the Prairie timber sale area so that reviewers of any environmental analysis can fully understand the extent of pine encroachment. It is completely inadequate to merely profess ignorance of what is acknowledged as perhaps the most important habitat component eliminated by past mismanagement: Historically, beaver may have been the most important biological influence on riparian ecosystems in the Black Hills... it is unknown whether the population in the Prairie Project Area is increasing or decreasing" [DEIS at 139, emphasis added]. An EIS must also disclose the acres desired to be meadows in the project area to compare with the acreage of meadows that may be created by the Prairie timber sale. This disclosure is necessary so that reviewers of any environmental analysis can fully understand the extent of the potentially significant effects of the timber sale, including the historical loss of aquatic habitat due to past inappropriate activities in formerly wet meadow

Agency Response:

Grassland and meadow communities and the effects of project activities are addressed in the Prairie DEIS (pg. 142-143). Depending on the alternative 20-26% of the meadow acreage in the project area is proposed for treatment to remove encroaching pine, because not all meadows are in need of treatment. Beaver, riparian habitats, and hardwood habitats are discussed in the Prairie DEIS (pgs. 139-142). Parrish et al. (1996), as referenced on pg. 139, includes a more extensive discussion of beaver decline in the Black Hills. Availability of hardwood communities plays a much larger role in distribution and abundance of beaver in the Black Hills than do wet meadows. Wet meadows are created by beavers, they are not a habitat component required by beavers. Restoring, maintaining, and enhancing hardwood communities by removing encroaching pine will be of far more benefit in providing beaver habitat than will meadow treatments. Riparian wetlands are generally sparse in the Prairie Project Area, and are often confined to a narrow margin of a stream or channel, rather than occurring as a

Letter No: 55 **Comment No:** 14 **Resource:** Range

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS environmental analysis must: analyze the impacts of livestock grazing on sensitive plants and their habitat.

Agency Response:

Comments noted. Livestock grazing is an authorized use of the Black Hills National Forest. The issue of Livestock grazing is not part of the decision to be made for the Prairie Project.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 15 **Resource**
Range

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS environmental analysis must: provide management objectives for weed management and provide standards and guidelines that specifically address the impacts of noxious weeds to sensitive plant species and their habitats.

Agency Response:

The Black Hills National Forest Noxious Weed Management Plan has Standard and Guidelines that specifically address sensitive plant species.

Letter No: 55 **Comment No:** 16 **Resource**
Range

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS environmental analysis must: specifically present a consistent and well - supported analysis of the effects of livestock grazing to Bloodroot; utilize, cite, and reference available scientific literature describing the effects of livestock grazing to sensitive plant species; provide monitoring requirements that quantify the impacts to sensitive plant species in order to ensure livestock grazing does not conflict with the values for which Botanical Areas may be designated; utilize and cite available scientific literature in order to analyze the indirect and cumulative effects of livestock grazing to sensitive plants; consider the effects of livestock to the viability of sensitive plant populations on the BHNF utilizing available scientific literature; and adequately disclose the effects of livestock grazing to sensitive plant species in order to meet the standards of analysis required by 36 CFR § 219

Agency Response:

Comments noted. The issue of Livestock grazing is not part of the decision to be made for the Prairie Project.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	17	Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Sensitive Plant Species - The Prairie DEIS must fully analyze and assess the potentially significant effects to the following plant species of concern and their habitats: Autumn coral-root (*Corallorrhiza odontorhiza*), Autumn willow (*Salix serissima*), Blunt-broom sedge (*Carex tribuloides*), Dwarf scouring rush (*Equisetum scirpoides*), Foxtail sedge (*Carex alopecoidea*), Giant Helleborine (*Epipactis gigantea*), Great-spurred violet (*Viola selkirkii*), Large roundleaf orchid (*Platanthera orbiculata*), Prairie dunewort (*Botrychium campestre*), Southern maidenhair-fern (*Adiantum capillus-veneris*), Spinulose shield fern (*Dryopteris carthusiana*), Trailing clubmoss (*Lycopodium complanatum*), Moschatel (*Adoxa moschatellina*), Maidenhair spleenwort (*Asplenium trichomanes*), Green spleenwort (*Asplenium viride*), Elegant sedge (*Carex bella*), Bristly-stalk sedge (*Carex leptalea*), Longstalk sedge (*Carex pedunculata*), Dog cryptantha (*Cryptantha cana*), American rock-brake (*Cryptogramma acrostichoides*), Large yellow ladies-slipper (*Cypripedium calceolus* var. *pubescens*), Beaked spikerush (*Eleocharis rostellata*), Woodland horsetail (*Equisetum sylvaticum*), Variegated horsetail (*Equisetum variegatum*), Showy prairie gentian (*Eustoma russellianum*), Secund Bladderpod (*Lesquerella arenosa* var. *argillosa*), Broad-leaved Twayblade (*Listeria convallarioides*), Stiff clubmoss (*Lycopodium annotinum*), Treelike clubmoss (*Lycopodium dendroideum*), Marsh muhly (*Muhlenbergia glomerata*), Gray's lousewort (*Pedicularis procera*), Arrow-leaved sweet-coltsfoot (*Petasites sagittatus*), Mountain holly-fern (*Polystichum lonchitis*), Hoary willow (*Salix candida*), Bloodroot (*Sanguinaria canadensis*), Woolrush (*Scirpus atrocinctus*), Thinleaved blueberry (*Vaccinium membranaceum*). We also request the final EIS present information and maps showing the occurrence of high quality and non high quality plant habitat, as well as documentation of the results of plant surveys conducted in these habitats. We also request the Forest Service fully analyze and assess the impacts to unique vegetation communities within the Prairie timber sale area. The Forest Service must also fully protect all unique vegetation communities and sensitive and/or rare plants in the Prairie timber sale area, and must utilize scientific information to gain an adequate understanding of the Prairie timber sale and render an informed and environmentally considerate decision. This must include collection of the information necessary to understand traditional plant uses and the types of habitat conditions necessary for these traditional plants. Merely professing ignorance ("the extent of traditional plant use is poorly known for the entire Black Hills" [DEIS at 209]) is totally unacceptable; this data must be collected. The Prairie DEIS environmental analysis must analyze the effects of forest management to sensitive plant species and cite and identify source documents to support the effects analysis. In addition, the Prairie DEIS environmental analysis must: provide specific standards and guidelines for sensitive plant species in all management areas on the BHNH; provide sufficient and specific standards and guidelines that assure the protection and viability of sensitive plant species; utilize sensitive plant monitoring data to support effects determinations; develop specific goals and objectives for monitoring populations of sensitive plants; develop a sensitive plant monitoring plan that provides quantitative, consistent, unbiased, and defensible data in order to determine what effects management activities are having on populations of sensitive plants; develop an understanding of traditional plant use forestwide, and inventory suitable habitats within the project area; provide standards for sensitive plants in their full range of habitats in order to protect sensitive plant species from all land management activities; and provide documentation and scientific evidence to support the effects determination for the Autumn coralroot.

Agency Response:

Region 2 sensitive species and the effects of project activities are addressed in the Prairie BA/BE (located in the project file). Plant surveys of the Prairie Project Area were conducted in 2002. cursory or general surveys were conducted in areas where the probability of finding a target plant species was lower, generally pine or upland grass/shrub habitat. More intense surveys were conducted where habitat was determined to offer greater probability to support target plant species. Such areas were often north-facing slopes, riparian, spring, and seep habitats, or at the base of rimrocks and cliffs. Complete floristic surveys were completed in these areas of high probability habitat. Target plant species included Region 2 sensitive species, those species tracked by the South Dakota and Wyoming Natural Heritage programs, Black Hills Plant Species of Interest, and noxious weeds. Results of the surveys, including maps, can be found in the project file. There is no management direction, nor management requirements for any plant species except Region 2 sensitive plant species. Design criteria and mitigation measures (Prairie DEIS Appendix B) developed as part of the action alternatives will minimize impacts and protect unique vegetation communities and plant habitats. Forest Plan direction to protect such habitats is included in the mitigation measures. Monitoring protocols have been developed and recently updated (US Forest Service 2003), as directed by the Forest Plan (pgs. IV-1 through IV-7) for all sensitive plant species. Results of monitoring are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). Monitoring data collected was used to support determinations of effects to sensitive plants in the Prairie BA/BE (located in the project file). Creation of standards, guidelines, goals, and objectives is beyond the scope of the Prairie analysis.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	18	Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Sensitive Animal Species - A. Northern Goshawk An EIS must be completed to fully analyze and assess the potentially significant effects to the northern goshawk using quantitative population information as a context for the assessment (i.e., how many individuals out of the population will be impacted). Collection of such necessary data is mandatory under NEPA, and an EIS is the proper vehicle for finally disclosing the direct, indirect, and cumulative effects on this species to the public and Forest Service decisionmakers. The EIS must also fully analyze and assess the potentially significant effects to potential goshawk nesting habitat (i.e., ponderosa pine vegetation structural stages 5 and 6) regardless of whether the habitat exists within a known territory, the potentially significant effects to goshawk post fledging habitat, and the significant effects to goshawk foraging habitat. The claim that creating SS-1 within PFA's is an "improvement" in vegetative balance [DEIS at 149] must be abandoned as without scientific merit. A recovery plan must be developed for how the Forest intends to restore the missing structural stage 5 and 6 habitat within the project area. Claiming that logging improves goshawk habitat over No-Action [DEIS at 148] is simply junk science, and all such claims should be removed from the final EIS. Claims that logging does not increase fragmentation of goshawk and older forest habitat [DEIS at 169] is junk science, and all such claims should be removed from the final EIS. We request that all late successional habitat and stands of structural stage 4C and 4B be deferred from any treatments in order to ensure an adequate amount of goshawk nesting habitat is protected. The Prairie DEIS environmental analysis must provide the necessary information and analysis that supports any measure designed to protect the northern goshawk and its habitat, and must ensure protective measures are enforceable and not contradictory. In particular, the Prairie DEIS must: define the size of goshawk habitat as it relates to any measure designed to protect the northern goshawk and its habitat on the BHNF; present BHNF-specific information and analysis that supports any size determination for goshawk habitat; provide measures that ensure goshawk nesting habitat is well represented and distributed on the BHNF and that respond to the habitat needs of the goshawk on the BHNF; analyze the specific effects to goshawk nesting habitat, as well as all other aspects of goshawk habitat and individual goshawks; provide standards and guidelines that maintain goshawk viability in accordance with the NFMA, its implementing regulations, and FSM direction; and provide the necessary information and analysis that supports any viability determination.

Agency Response:

The goshawk is addressed in the Prairie DEIS (pgs. 144-149), and in the Prairie BA/BE (Project File). Northern goshawk nesting activity is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). The northern goshawk is also monitored by the Rocky Mountain Bird Observatory (Panjabi 2002, 2003), although several more years of data will be required before conclusions regarding habitat use and population size or trend can be made. In addition, surveys for this species are conducted in areas with potentially suitable habitat, but where there is no known territory. Species viability is beyond the scope of the Prairie Project EIS, as is the distribution of the population or habitat across the Forest. The northern goshawk is also addressed in the Phase I BA/BE (USDA Forest Service 2001). Forest Plan direction (Guideline 3114 treated as a Standard) to provide a balance of Vegetation Structural Stages in goshawk Post-fledging Areas was adopted in the Phase I Amendment to the Forest Plan. This balance of structural stages was derived from interviews with goshawk experts (USDA Forest Service 2000), and is intended to provide habitat for prey species, an important component of goshawk habitat. The alternatives presented in the Prairie DEIS were designed specifically to protect goshawk and their habitat. Design criteria and mitigation measures (Prairie DEIS Appendix B) developed as part of the action alternatives will minimize impacts and protect goshawks and their habitats. Creation of standards and guidelines and species viability are beyond the scope of the Prairie analysis, as is the sufficiency of Forest Plan direction for goshawk.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 19 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Sensitive Woodpecker Species - We are very concerned over the impacts of the Prairie timber sale to sensitive woodpecker species. Various scientific sources have clearly established the relationship between healthy woodpecker populations and wood-boring beetles and late-successional habitat, which makes it difficult to believe the Prairie timber sale will not further jeopardize the viability of sensitive woodpecker species and diversity on the Black Hills. The final EIS must therefore fully analyze and assess the potentially significant effects of the Prairie timber sale to the three-toed woodpecker, black-backed woodpecker, and Lewis's woodpecker. The final EIS must fully analyze and assess the impacts of reducing, eliminating, or otherwise attempting to control in any way, any and all mountain pine beetle or other insects within the project to sensitive woodpecker species populations in accordance with 36 CFR § 219.19(a)(5). We request the Forest Service allow mountain pine beetle outbreaks to occur in a large part of the Prairie timber sale area to provide sensitive woodpecker habitat. We also request the Forest Service analyze and assess the potentially significant effects to red-headed woodpecker, downy woodpecker, hairy woodpecker, and red-naped sapsucker. The Prairie DEIS environmental analysis must provide standards and guidelines that ensure habitat capability for these woodpecker species does not decrease in order to provide for the viability of this species. In particular, the Prairie DEIS must: provide standards and guidelines, supported with the necessary analysis and information, that maintains the viability of the three-toed, black-backed, and Lewis' woodpecker; allow natural fires to occur at some level on the BHNH in order to benefit the three-toed, black-backed, and Lewis' woodpecker; present information and analysis stating how many acres might be expected to burn in wildfires on the BHNH; and analyze the effects of Objectives 224 and 225, or any other similar objectives, standards, guidelines, or requirements, to the three-toed, black-backed, and Lewis' woodpecker.

Agency Response:

Region 2 sensitive woodpeckers are addressed in the Prairie BA/BE (Project File). The Forest Plan provides clear direction on the objectives of controlling infestations of mountain pine beetles and other pathogens, and minimizing acreage burned by wildfires. Large expanses of habitat for some species of woodpeckers have been created by the large wildfires in recent years (e.g. Jasper, Elk Mountain, Roger's Shack, Battle Creek, Grizzly Gulch, etc.). These fires, combined with the ongoing pine beetle outbreak in Beaver Park and other areas, has created a great deal of woodpecker habitat across the Forest. The Forest has contracted with the Rocky Mountain Bird Observatory to provide statistically rigorous, long-term population trend data on most diurnal, regularly breeding bird species in the Black Hills, including woodpeckers. However, since this monitoring program is only in its third year, it is too soon to assess whether population sizes are changing, and if so, whether trends are positive or negative. It will take several years before any conclusions can be made from data collected. Creation of standards and guidelines and species viability are beyond the scope of the Prairie analysis, as is the effects of Forest Plan objectives.

Letter No: 55 **Comment No:** 20 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Northern Leopard Frog - The Prairie DEIS environmental analysis must describe population and habitat status, trends and objectives for the northern leopard frog. In particular, the Prairie DEIS must: provide monitoring objectives specific to the northern leopard frog; provide an estimate of population and habitat status and trend for the northern leopard frog to provide a context for the effects of management actions in light of dramatic declines in some populations; provide information and analysis that supports the effectiveness of mitigation measures designed to protect the northern leopard frog and ensure this species viability; and ensure viable populations of northern leopard frog are maintained on the BHNH.

Agency Response:

The northern leopard frog is addressed in the Prairie BA/BE (Project File). Riparian communities and the effects of project activities are addressed in the Prairie DEIS (pgs.139-140). The leopard frog is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). Species viability is beyond the scope of the Prairie analysis.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	21	Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Snail Species of Concern - The final EIS must fully analyze and assess potentially significant effects to all known snail colonies and all potential snail species of concern habitat. An EIS must also fully disclose the location of all snail species of concern colonies within the Prairie timber sale area to ensure protection measures adequately protect all known and potential colonies. The final EIS must also fully disclose the cumulative impacts to snail species of concern due to past water developments and spring diversions within the project area, including draining of wet meadows and elimination of beaver colonies.

We request that the Forest Service implement at least a 1,000- foot buffer to adequately protect all known snail colonies. This buffer is to ensure that colonies, which are known to shift over time, are fully protected and to ensure their habitat is adequately protected. The Prairie DEIS environmental analysis must describe the current population and habitat status of snail species of concern. In particular, the Prairie DEIS must: fully address the findings of the 1993 and 2002 Frest and Johannes reports; disclose the status of existing habitat for snail species of concern using the 1993 and 2002 Frest and Johannes reports; and develop clearly stated population and habitat objectives and develop a species specific monitoring plan with specific monitoring objectives for snail species of concern.

Agency Response:

Snail species of concern are addressed in the Prairie DEIS (Pg. 154). Both Region 2 sensitive snail species are addressed in the Prairie BA/BE (Project File). Mitigation measures (Prairie DEIS Appendix B) will minimize impacts and protect unique wildlife habitats. Development of population, habitat, and monitoring objectives is beyond the scope of the Prairie analysis.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
55	22	Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Aquatic Species - The final EIS must fully analyze and assess the potentially significant effects to native fish species. Numerous concerns have been expressed over native fish viability on the BHNF (see e.g., Chief's 1999 Appeal Decision for Appeals of the 1997 BHNF Revised Forest Plan) and therefore, the agency is obligated to ensure the Prairie timber sale does not adversely affect these fish species. In addition to the mountain sucker, the Prairie DEIS must document the level of suitable habitat for the finescale dace in order to satisfy the disclosure requirements of NEPA. The final EIS must also fully disclose the cumulative impacts to aquatic and native fish species of concern due to past water developments and spring diversions within the project area, including draining of wet meadows and elimination of beaver colonies. Of particular concern is the potential existence of finescale dace within the analysis area. We therefore request that the Forest Service conduct surveys for finescale dace to determine whether or not the fish still exists. Survey data will also enable the Forest Service to better analyze and assess the impacts of the Prairie timber sale to native fish species. We request that all native fish species be fully protected, and that the relationships between native fisheries and beaver be fully explored. The Prairie DEIS environmental analysis must clarify which species of fish on the project area are native and exactly where these native fish species currently exist on the BHNF, and must present historic and current distribution, habitat condition and trend, population status and trend, and the effects of proposed actions to native fish species on the BHNF. In particular, the Prairie DEIS environmental analysis must: fully disclose the affected environment and analyze the effects of proposed actions to fisheries resources on the project area; provide analysis and information that supports the effectiveness of best management practices ("BMP's"); utilize habitat and population monitoring information and inventory information; provide analysis and information that supports any determination that the impacts of current management to native fisheries are not significant; analyze the impacts of non-native fish species to native fish species; provide scientifically supported measures that protect native fisheries and ensure native fish species viability; ensure viable populations of existing fish species are maintained on the BHNF; and provide analysis and information that supports any measures that protect existing fish populations on the BHNF. This analysis must also include aquatic MIS population trend monitoring data.

Agency Response:

Additional discussion of instream fisheries habitat and the effects of the alternatives has been included in the Errata section of the Prairie FEIS. The Prairie Project File also contains further information. There is no evidence that habitat for MIS excluded from detailed analysis, such as the finescale dace, has been lost; rather it appears never to have existed, at least within recorded Black Hills history. Fish populations are monitored Forest-wide by South Dakota Game, Fish and Parks, the results of which are found in the annual Forest Monitoring Reports. The Selection Report: Aquatic Management Indicator Species for the Black Hills National Forest (USDA Forest Service 2001a), as referenced in the discussion of aquatic MIS species (pgs. 151-154), identifies native and non-native fish species in the Black Hills, and includes other information such as present status, occurrence and population density, habitat requirements, effects of habitat changes and management practices. Species viability and the sufficiency of Forest Plan direction for aquatic species are beyond the scope of the Prairie analysis.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 23 **Resource:** Veg

Defenders of the BH / Native
Ecosystems Council

Comment:

Culmination of Annual Increment (CMAI) - The Prairie DEIS does not even include an index entry for "Culmination of mean annual increment" other than the definition presented in the Glossary [DEIS at 239], clearly failing to document compliance with this NFMA direction. The meager mention of 368 stands that had "essentially reached CMAI" [DEIS at 80] is insufficient to meet CMAI disclosure requirements. We again point out to the Forest Service that the Black Hills LRMP contains no exemptions for CMAI that have been vetted through public participation processes (see again our LRMP Appeal). In addition, recent case law on the Black Hills National Forest (see Hollow litigation ruling) has declared that all stands must meet CMAI requirements, not just even-aged or timber production stands.

The Prairie DEIS fails to disclose compliance with CMAI requirements. The revised Prairie DEIS must fully disclose the CMAI attainment for all stands included for manipulation in any proposed action alternatives, regardless of the

Agency Response:

Compliance with Culmination of Mean Annual Increment (CMAI) requirements is discussed in Appendix D: Silvicultural Findings and referenced in the table of contents, page xi of the Draft EIS. In addition, it is discussed in Chapter 3 – Vegetation (table of contents page ix). On page D-7, reference is made to the Federal Code of Regulations (36CFR 219.16a 2iii), which outlines requirements of CMAI.

Letter No: 55 **Comment No:** 24 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Late Successional Habitat (Old Growth) - The final EIS must fully analyze and assess the potentially significant effects to late successional forest habitat, including the effects upon all potential late successional habitat (i.e., the effects of the Prairie timber sale to existing old growth stands and to late successional recruitment). This analysis must also differentiate between tree species. Also, claims that logging does not increase fragmentation [DEIS at 169] must be removed from the final EIS as scientifically unsupportable. The DEIS does not even contain an index entry for "old growth" and the "late succession" entry [DEIS at 245] merely points to the Glossary definition, indicating that there is actually no old growth habitat assessment whatsoever contained in the Prairie DEIS. The discussion on pp. 134-135 merely lists the acres of "late successional forest" to be sacrificed for alleged fire risk reduction objectives (187 acres in Alternative B and 649 acres in Alternative C). This, of course, is woefully insufficient to meet the professional and scientific integrity mandates of NEPA and the viable populations directives of NFMA. To complete this analysis and assessment, the Forest Service must first analyze whether or not the amount of late successional forest in the project area is sufficient to meet the needs of populations of wildlife species dependent on late successional forest. The Forest Service must then analyze the effects of the Prairie timber sale to late successional habitat (including future late successional habitat) in terms of the needs of those species of wild life dependent on this specialized habitat (e.g., northern goshawk, marten, sensitive woodpecker species, pygmy nuthatch, northern flying squirrel, golden-crowned kinglet, and brown creeper). We request that all late successional habitat and all potential late successional habitat be protected.

Agency Response:

Late successional forest is addressed in the Prairie BA/BE (pgs. 134-135). Additional index entries have been added to the Final EIS. The sufficiency of Forest Plan direction for late successional forest, including designation of Management Area 3.7, is beyond the scope of the Prairie analysis. Region 2 sensitive species associated with late successional habitats are addressed in the Prairie BA/BE (located in project file). Commentor's request that all late successional habitat and all potential late successional habitat be protected is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 25 **Resource:** Wildlife

Defenders of the BH / Native
Ecosystems Council

Comment:

Cumulative Effects - The Prairie DEIS is totally inadequate regarding disclosure of cumulative effects. The Prairie DEIS contains absolutely no assessment of impacts to old-growth habitat, or associated species. This despite the fact that the decline in old growth conditions from historical levels is an obvious indicator of significant adverse impacts from the past century of management manipulations and activities. After all, much of the project area was old-growth stands or beaver-occupied wet meadows that would have certainly provided suitable habitat for these species. Similarly, the past century has seen the extirpation of the grizzly and timber wolf, as well as the marten. Surely these demises represent cumulative impacts, yet the Prairie DEIS is silent on these matters.

Agency Response:

Cumulative effects to wildlife habitats are addressed in the Prairie DEIS (pgs. 170-173), including the acknowledgement that numerous activities (such as timber harvest and fire suppression, among many others) have influenced the condition of wildlife habitats in the project area (pg. 170). Also acknowledged is the fact that "cumulative effects of past and current timber management activities include moving much of the dense, mature conifer forest that resulted from fire suppression toward younger, more open stands," and "older, larger diameter-class stands were harvested, and medium-aged stands were precluded from achieving late successional character through treatment" (pg. 171). Moreover, the Prairie DEIS acknowledges that "commercial and non-commercial treatments proposed ... would continue this trend by setting back succession relative to the acreage treated, thus further contributing to cumulative effects of past timber management activities" (pg. 171)

Letter No: 55 **Comment No:** 26 **Resource:** Veg

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS also pretends that the proposed logging actions will not reduce the number of large trees in a manner similar to everywhere else on the Black Hills National Forest, by omitting one or two likely reentries in the next twenty years in the projections of their Forest Vegetation Simulator. Such fraudulent presentations must be corrected with accurate disclosures of the cumulative impacts of the unsustainable logging that has occurred, and continues to occur, across the Black Hills National Forest, including on the Prairie project area. The Prairie DEIS fails to actually assess impacts to any forest resource from past, present, and reasonably foreseeable future activities. The mere listing of past and ongoing timber sales by watershed is completely inadequate under NEPA disclosure mandates. The DEIS fails to identify which of the "overstocked" stands are the result of past bulldozing of aspen stands within the project area. The DEIS fails to disclose how the past 125 years of "logging on demand" and unconstrained firewood gathering have eliminated woodpecker habitat, eliminating this natural control on insect cycles. The DEIS never explains how the current "high risk" situation arose, or how continuing the 60-80 basal area highgrading that has been ongoing on the Black Hills for decades now will lead to better results than it has in the past. Repeating past actions and expecting different outcomes is one familiar definition of insanity, which is what passes for forest management on the abused Black Hills National Forest.

Agency Response:

Growth modeling predicted future stand conditions at twenty-year cycles. Most stand re-entries occur on twenty year cycles. However, during the twenty year cycle, changed conditions (i.e. storm and insect damage) and changes in management direction (i.e. National Fire Plan direction) may foster the need for additional treatments within a twenty year cycle. Modeling is done based on current direction. Generally, larger trees will be retained in favor of removing smaller ones. Some larger pine will need to be removed in order to open up the pine stands to reduce crown fire hazard where the removal of only small diameter trees will not achieve the desired open spacing.

Other treatments such as hardwood restoration and meadow restoration will also remove larger pine. Most treatments will favor leaving larger pine because the crowns of the larger pine are higher off the ground surface and have a lower probability of ignition from a ground fire. We know of no bulldozing of aspen stands within the project area except for road construction activities in the past. The proposed Alternatives B and C are two approaches that diverge from past management. By lowering stand densities, intensive treatment of existing and created logging debris, and extensive prescribed burning, the proposed alternative C and alternative B does vary from past actions. The commentors respected opinion of forest management on the Black Hills NF is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 27 **Resource:** Plan

Defenders of the BH / Native
Ecosystems Council

Comment:

The Forest Service also fails to perform the continuous monitoring of species and habitats that are required under NFMA. Indeed, the only reference in the index to "monitoring" is to the entry in the Glossary defining "monitoring". This completely violates both the spirit and letter of NEPA and NFMA, and must be corrected by presentation of all required monitoring data in the revised draft Prairie DEIS

Agency Response:

Monitoring is discussed on page 32 of the DEIS. The Prairie Project Monitoring Plan is provided in Appendix C of the DEIS. Monitoring protocols (USDA Forest Service 2003) have been developed for all MIS as well as numerous habitat components such as late succession, snags, down woody material, etc., as directed by the Forest Plan (pages IV-1 through IV-7). Results of monitoring activities are published annually (USDA Forest Service 1998,1999, 2000, 2001, 2002, 2003 in press).

Letter No: 55 **Comment No:** 28 **Resource:** Veg

Defenders of the BH / Native
Ecosystems Council

Comment:

Effects on Insect Populations-Amazingly, the Prairie DEIS fails to inform the decisionmaker what levels of beetle populations are needed to achieve mortality levels that exceed annual green growth, i.e., the "epidemic threshold" that will result in an actual decline in the amount of live pine fuels in the project area. This is crucial, even at current "endemic" levels, because if pine volume is declining (now or at some future time), then a natural fire risk reduction is occurring that will benefit the project area in the future. The pie charts given for Existing and 2022 conditions [DEIS at 80] fail to provide this essential information, [For example, personal field observations in the Forbes Gulch area document the rapid loss of fire potential of dead pines in beetle outbreak areas, where fine fuels can be observed to be eliminated by roughly 50% per year for each year after mortality, leading to effective fire breaks in as few as three to five years.] The moister conditions found in unlogged stands also lead to rapid development of rot in the standing and downed materials, lead to "punk" logs and snags that act as sponges holding water within the ecosystem and actually reducing fire potentials. The DEIS is silent on these beneficial aspects of natural processes.

Agency Response:

Allowing insect populations and associated mortality to reach epidemic thresholds is contrary to Forest Plan Goals and doing so in this urban interface setting would be irresponsible. While natural thinning and openings created by insects would open up stands of pine and in some cases totally "wipe out" others. The three to five years of high fire hazard and buildup of ladder fuels would increase the probability of a catastrophic crown fire.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 29 **Resource:** Fire/Fuels

Defenders of the BH / Native
Ecosystems Council

Comment:

Effects on Future Fires-The Prairie DEIS is premised entirely on (undocumented and unproven) assumptions on the alleged reduction in fire hazard provided by commercial and non-commercial logging activities: "The focus of the actions proposed is to aggressively manage the vegetation in the project area to minimize the potential for large-scale catastrophic wildfires... The primary focus is to remove vegetation and associated fuels thus reducing the unnaturally high concentration of biomass in the Forest" [DEIS at iii]. The continues the "leap before you look" approach of proceeding in ignorance (or on the basis of "rosy" assumptions) that the Forest Service has long employed, focusing on alleged areas requiring priority "treatments." Little attention has been devoted to the appropriateness and effectiveness of alternative fuel treatments. This is glaringly obvious on the Black Hills, where a century of logging-on-demand has reduced the fire-resistant natural pine forest to a fire-prone jack-pine thicket covering now over a million federal acres. Logging practices from the past led directly to this condition, and must be abandoned if fire reductions are to be achieved in the future. The "rosy" assumption that any form of thinning will be effective in modifying fire behavior is unsupported by experience on the Black Hills, and elsewhere in the West. There is a startling lack of scientific information on which to base management decisions as to fire impacts, making the colored graphs and charts presented in the Prairie DEIS little more than a colossal waste of taxpayer money. The Forest Service simply has no data whatsoever on the distribution of ladder fuels across the landscape, since the Forest has repeatedly rejected our calls to abandon the current tree-farm structural stage classification and implement a comprehensive database that included comprehensive data on the understory potential and current conditions. Instead, we find just more "voodoo" forest management: "Generally, this support is based on the belief that commercial timber harvest utilizes a renewable resource and provides a needed commodity, employs local residents, adds favorably to the local and State economy, is environmentally acceptable, and can make a significant difference in quickly and effectively reducing wildfire potential" [DEIS at 18, emphasis added]. Unfortunately, there is little evidence in the scientific literature for this "belief" that is promoted so actively by the Forest Service, timber industry, and local politicians. The following summary of findings from a report by Forest Trust (H.H. Carey and M.E. Schumann, April 2003) points out the lack of scientific support for the rosy assumptions that form the rationale for the Prairie timber sale: The scientific literature provides tenuous support for the assertion that simply reducing tree density can reduce wildfire hazard; Other factors, including the distance from the ground to the base of the tree crown, surface vegetation, and dead materials, also play a key role in addition to tree density; Substantial evidence, including empirical studies, supports the effectiveness of prescribed fire, a treatment that addresses all of the above factors; Mathematical simulation and computer models produce highly variable results, and are generally unvalidated with actual fire data; and the proposal that commercial logging can reduce the incidence of canopy fire was untested in the scientific literature. Thus, the major underlying assumptions driving the proposed activities for the Prairie timber sale are seen to be unsupported in the scientific literature (for example, the claim that the commercial treatments make Alternative C the "most effective" alternative rests entirely on unvalidated assumptions presented as "analysis" in the DEIS). The uncertainty in these assumptions of benefit from logging should be evaluated in light of the known loss in fire resistance that has been produced by repeated high-grading logging on the Black Hills for over a century. The Forest Service fails to disclose the continual increase in forest-wide fire risk levels with the ongoing shelterwood timber program. Each year, the trees in the forest become younger, and therefore closer to the ground, of finer fuels, and therefore more flammable. The Forest Service must fully disclose the critical role played by unsustainable logging and grazing levels on promoting ever-younger pine stands and ever-more-fire-prone landscapes. The revised draft Prairie DEIS must develop a range of alternatives that enhances the fire-retardant effects on forest landscapes of increased levels of old growth habitat, as well as increased wet meadows and beaver colonies. Road levels on the Black Hills are also so excessive that any existing road must be regarded as more of a fire threat than an aid to fire fighting (take note of the increasing

Agency Response:

Comment has been read and opinions noted. Past management including fire suppression dating from the late 1800's has created the forests that are present on the Black Hills National Forest. These forests tend to be denser with fewer openings than what was present prior to 1900 and they are more susceptible to large crown fires. Based upon recent research and literature review, it is evident that vegetation management can be used to reduce the potential for large crown fires. For example, this is supported by an assessment of the Hayman Fire, which showed that two restoration projects did have the effect of reducing fire behavior when compared to adjacent untreated stands. The summary report for the Rodeo-Chediski Fire states "that even under the most severe drought conditions on record, and given an event with extreme fire behavior, positive benefits can be attributed to forest management activities that reduce crown densities, raise canopy heights and diminish fuel loadings. The Cone Fire, Megram Fire, Cerro Grande and the Hi Meadows Fire are also examples where fuels management including vegetation management such as thinning and prescribed burning helped mitigate some effects that wildfire had on the ecosystem. Note, the Forest Service acknowledges that it is impossible to prevent forest fires including crown fire. However, vegetation management can reduce the chances of a crown fire occurring and can be used to mitigate some of the effects that they have on the ecosystem. Opinion on the effects of roads on fire management is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 30 **Resource**
Plan

Defenders of the BH / Native
Ecosystems Council

Comment:

Range of Alternatives-Table 2-2 [DEIS at 45] presents an alleged “treatment outputs by alternative” from which it can be seen that the “action” Alternatives B, C, and D do not differ in any meaningful way, at least not as considered a reasonable range by NEPA, in the non-commercial treatments that might conceivably provide the fire-reduction benefits allegedly driving this project. Alternatives involve non-commercial “treatments” of 6,338 to 8,773 acres [“fuel breaks” of 505 to 692 acres; non-commercial “thinning” of 4,177 to 6,252 acres; non-commercial “pine removal” of 2,599 to 1,738 acres; and “special cuts” of 50 to 91 acres]. And these are not even meaningful measures of impacts, disclosing virtually nothing of what impacts will occur from the proposed actions (the Forest Service never explains how 14,460 acres of non-commercial treatments and prescribed burnings in Alternative B provides less “effectiveness” at wildlife hazard reduction than the 12,997 acres in Alternative C). Only minor differences in mitigation activities differentiate these “alternatives”, which fail to provide the reasonable range of alternatives mandated by NEPA. And amazingly, miles of road construction and reconstruction are not even presented to the public or the decisionmaker.

Agency Response:

Alternative A provides a no action basis for comparison of alternatives. Alternative B emphasizes fuels treatment using primarily non-commercial vegetation treatment and as well as a stronger emphasis on prescribed burning to address the need for fuel and fire hazard reduction. Alternative C represents an aggressive commercial and non-commercial treatment combination as well as some prescribed fire. Alternative D emphasizes implementation per the Forest Plan. Table 2-2 on page 45 of DEIS is a tabular summary of vegetation treatment outputs. Table 2-1 on page 44 of the DEIS summarizes the effects of alternative implementation to the key issues identified and developed during scoping and analysis. These effects are compared based on measurement indicators as described. Specifics on road construction, reconstruction and other related activities are presented in the Transportation Section, Chapter 3, starting on page 70 of the DEIS.

Letter No: 55 **Comment No:** 31 **Resource**
Plan

Defenders of the BH / Native
Ecosystems Council

Comment:

In addition, the Prairie DEIS completely fails to even address the future conditions that will be produced by the No-Action Alternative mandated by NEPA. What are the conditions that will result from allowing the natural processes to play themselves out unimpeded? The DEIS is silent, even though natural processes such as insect outbreaks and wildfires are the most effective way of expanding hardwood stands and allowing non-pine species literally “a chance in the sun.” These processes, moreover, should be regarded as “extended weather events” for which no intervention is taken until the “event” is over, much as is done for storm damage. These processes are overwhelmingly beneficial to the forest ecosystem, even if they cause (temporary) inconveniences to humans who cannot understand natural time scales. The Forest Service cannot both denigrate the No-Action Alternative for these alleged undesirable likely future outcomes, and then simultaneously fail to analyze the beneficial ecological effects of the same “undesirable” events. In fact, the Forest Service has never provided even a single adequate analysis of a No-Action alternative on the Black Hills National Forest. This deficiency must be rectified in the Final EIS.

Agency Response:

Chapter 3 of the DEIS provides disclosure of the environmental consequences of implementing not only the action alternatives but also the no action alternative. Documented under the respective resources is discussion of cumulative impacts including those resulting from past, present, and reasonably foreseeable actions.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 32 **Resource:** Fire/Fuels

Defenders of the BH / Native
Ecosystems Council

Comment:

The Prairie DEIS's "direct and indirect effects" section on impacts to forest vegetation claims that Alternative A would do nothing to reduce fire hazard in the project area, yet fails to provide any scientific references or documentation of how any of the action alternatives would achieve reductions in fire hazard (other than the bald assertions of rosy outcomes described above). Indeed, the Forest Service has failed for many years now to provide even a theoretical mechanism of how its proposed logging activities actually impact natural processes such as fire and insects (for example, bald assertions of "changing microclimatic conditions" fails to explain why aspect differences which produce the same microclimatic differences fail to register among beetle populations, e.g., north vs. south aspects). The benefits of future fire reductions from pine removal by natural processes are also completely ignored in this defective DEIS.

Agency Response:

Opinion noted. The comment regarding possible benefits in fire reduction from pine removal caused by natural process was noted. The effects of not reducing natural fuels and vegetation are disclosed in the Fire and Fuels section starting on page 102 of the DEIS.

Letter No: 55 **Comment No:** 33 **Resource:** Social

Defenders of the BH / Native
Ecosystems Council

Comment:

A full spectrum of alternatives, including those "eliminated from further consideration" must be developed for assessment and evaluation in the Prairie DEIS. In accordance with the Executive Order on Environmental Justice and the associated Memorandum (30 Weekly Comp. Pres. Doc. 279), NEPA, the CEQ implementing regulations, and the CEQ Guidance, the Forest Service was required to rigorously explore and objectively evaluate a range of reasonable alternatives that achieve Environmental Justice for American Indian populations. Indeed, analyzing a range of reasonable alternatives that, in one way or another, achieve Environmental Justice for American Indians is entirely within the scope of the agency's duty to ensure a reasoned and informed decision that considers all the relevant factors. Consequently, an agency's failure to consider a range of reasonable alternatives that address the needs, concerns, and values of American Indians is entirely indicative of a failure to achieve Environmental Justice. In the case of the Prairie DEIS, the Forest Service entirely failed to consider a range of reasonable alternatives that achieve Environmental Justice because the agency failed to consider a range of reasonable alternatives that respond to major issues raised by American Indians. Specifically, the Forest Service's failure to consider alternatives that provide for co-management, and alternatives that provide or recommend entire or partial transfers of National Forest System land to American Indian tribes is entirely indicative of a failure to achieve Environmental Justice.

Agency Response:

See response to Letter 55 Comment(s) 5 and 2.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 34 **Resource:** Social

Defenders of the BH / Native
Ecosystems Council

Comment:

Co-Management With American Indians-The Forest Service failed to respond to American Indian requests for a co-management alternative, clearly indicating the agency failed to analyze a range of reasonable alternatives that achieve Environmental Justice. Co-management (i.e., sharing of management responsibilities) with American Indians does not entail a "sale" or "transfer of administration" of National Forest lands. In fact, the Forest Service has entered into numerous agreements and Memorandums of Understanding with state agencies, colleges and universities, private organizations (e.g., Rocky Mountain Elk Foundation, The Nature Conservancy), county governments, and grazing associations that provide for shared management responsibilities of National Forest resources. As a perfect example, the Forest Service often shares management indicator species monitoring responsibilities with state wildlife agencies, a responsibility delegated specifically to the Forest Service through the NFMA implementing regulations at 36 CFR § 219.19(a)(6). Additionally, the Forest Service shares livestock management duties with grazing associations. The bottom line is that the Forest Service can and does share management responsibilities of resources on National Forests. The Forest Service's characterization of American Indian co-management as requiring some type of legislative or other agency action is therefore entirely flawed and refutes the agency's claim that such an alternative is outside the scope of the current decision. Such prejudicial dismissal of an American Indian alternative clearly shows the Forest Service did not take seriously the needs, concerns, and values of American Indians.

Agency Response:

This concern is beyond the scope of the Prairie DEIS. The Forest Service and tribal representatives have co-authored a Memorandum of Agreement, which would result in the formation of a Tribal Government Advisory

Letter No: 55 **Comment No:** 35 **Resource:** Social

Defenders of the BH / Native
Ecosystems Council

Comment:

Land Transfers to American Indians-The Forest Service entirely dismisses requests for land transfers to Indian Tribes, presumably on the basis that such topics require departmental or legislative actions or come under the authority of other agencies and are outside the scope of land management planning decisions. Clearly the Forest Service does not seem to grasp what both the CEQ implementing regulations and the courts have ruled with regards to alternatives that are not within the jurisdiction of the agency. As the courts have held: "its [NEPA's] purpose is not to be frustrated by an approach that would defeat a comprehensive and integrated consideration by reason of the fact that particular officers and agencies have particular occasions for and limits on their exercise of jurisdiction." *Henry v. FPC*. In this case, the Forest Service has done exactly what the court held to be contrary to the purpose of NEPA, that is the agency dismissed alternatives purely for jurisdictional reasons, thus precluding a "comprehensive and integrated consideration" of the impacts of its decision. Requests that the Forest Service consider alternatives that propose land transfers to American Indian tribes are entirely reflective of the potential impacts of the proposed actions to American Indian populations and their needs, concerns, and values. Additionally, these requests are clearly reflective of a "major public issue, management concern, and resource opportunity." See, 36 CFR § 219.12(f)(5). In this context, the Forest Service clearly failed to undertake a "comprehensive and integrated consideration" of the impacts of its decisions. In the context of comments received from American Indian governments, organizations, and individuals, sovereignty over National Forests was clearly a major issue and one that was precipitated by significant American Indian concerns over the impacts of historical and present-day management, especially the impacts of past Treaty violations that continue today. The Forest Service seems to assume that, while major public issues help determine the scope of an agency action, major American Indian issues do not factor into the NEPA process. Yet, the Forest Service made no mention of American Indian concerns and made no attempt to distinguish the fact that it was American Indians who requested the Forest Service provide an assessment of land transfers through the NEPA analysis process. The failure to consider a land exchange alternative in the context of American Indian concerns further indicates a failure to address potentially adverse and disproportional impacts to American Indian populations in accordance with the Executive Order on Environmental Justice.

Agency Response:

For a discussion of American Indian issues on the scale referenced in this comment, see pp. III-507 through III-509 and F-1 through F-5 of the Final Environmental Impact Statement for the Black Hills National Forest 1996 Revised Land and Resource Management Plan.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 55 **Comment No:** 36 **Resource:** Plan

Defenders of the BH / Native
Ecosystems Council

Comment:

Lack of Required Index-The Forest Service is required by law to provide an index to a Draft Environmental Impact Statement. The "index" included in the Prairie DEIS (pp. 223-225) is overwhelmingly a meaningless reference, pointing only to the terms in the "Glossary" [DEIS at 237-256]. The DEIS must be withdrawn and reissued with the comprehensive index as required by NEPA and CEQ regulations.

Agency Response:

Additional index entries have been provided in the Prairie FEIS.

Letter No: 56 **Comment No:** 1 **Resource:** Plan

Greater Dacotah Chapter
Safari Club International

Comment:

Our members of the Greater Dacotah Chapter of Safari International would like to make the following comments concerning the Prairie Project Draft E.I.S. Plan. We feel that Alternative C would be the best solution to accomplish the Forest Services objectives with the following exceptions:

Agency Response:

Thank you for your support of the Prairie Project and Alternative C (with noted exceptions).

Letter No: 56 **Comment No:** 2 **Resource:** Trvl/Rec

Greater Dacotah Chapter
Safari Club International

Comment:

Exception: We feel that road restrictions and closures must be a bigger part of this plan for Travel Management. A. Extend southern boundary of Alternative C yearlong closure to Forest Road 159. B. The entire area be classified no cross country travel (Prairie Project). This will help lower the introduction of noxious weeds and creation of unauthorized two (2) and four (4) wheel roads and trails.

Agency Response:

Your desire for Alternative C to extend the southern non-motorized boundary to Forest System Road 159 is noted, as is your desire to have the entire project area restricted from off-road motorized use. Please note that Alternative B restricts cross country motorized use over the majority of the project area. Page 179 of the DEIS acknowledges the increase in weeds along travel routes.

Letter No: 56 **Comment No:** 3 **Resource:** Wildlife

Greater Dacotah Chapter
Safari Club International

Comment:

Exception: The area east of Norris Peak Rd. and North of Hwy 44 is now 5.4 big game management area. This should not now be opened for Alt C yearlong. This will only drive big game onto private ground and increase depredation fees paid by the SD GF&P to private land owners. We definitely are against this trade off.

Agency Response:

Commentor's opposition to changing travel management in the area east of Norris Peak Road and north of Highway 44 is noted. Alt. C proposes this area to be open year-round to motorized travel, whereas roads in the area are now seasonally closed. Seasonal closure of this area to motorized travel was analyzed in Alt. D, and year-long closure was analyzed in Alt. B.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 56 **Comment No:** 4 **Resource:** Veg

Greater Dacotah Chapter
Safari Club International

Comment:

The use of controlled burns can greatly help to re-establish biodiversity of shrubs, forbs, grasses, aspen, and bur oak trees within this project boundaries. The chart on page 76, chapter 3 of the Prairie Project Area Draft E.I.S. shows the lack of this diversity (86%) conifers. In order to obtain this diversity the use of prescribed burns according to Forest Plan 1997 Phase I standards is to be used. We agree that this is a needed plan of action and a necessary tool to accomplish this.

Agency Response:

Thank you for your comments. Extensive prescribed burning is proposed in alternatives B and C.

Letter No: 56 **Comment No:** 5 **Resource:** Range

Greater Dacotah Chapter
Safari Club International

Comment:

However, we feel that several areas need to be addressed and written into the plan of action. A. That all permittees within the boundaries of this project be notified that they may be required to find alternative summer pasture for three (3) years to accomplish this needed restoration of biodiversity within the forest. Grazing is a privilege not a right. The USFS is not responsible to provide alternative grazing for these permittees. We would like to request that the following items be written into the project ROD (Record of Decision).

Agency Response:

Thank you for your comments on grazing. Your concerns will be reviewed with affected permittees in upcoming winter meetings. These issues are not part of the decision to be made for the Prairie Project.

Letter No: 56 **Comment No:** 6 **Resource:** Veg

Greater Dacotah Chapter
Safari Club International

Comment:

Monitoring of plants, Shrubs, and deciduous trees pre and post prescribed burn. This will provide the needed data to show if the biodiversity of plants and trees has been attained.

Agency Response:

Monitoring is a key component of project implementation.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 57 **Comment No:** 2 **Resource:** Fire/Fuels
Miller Gerald

Comment:

Some maps also show high crown Fire Potential in Sections 17 and 18 where they adjoin us on the south. Can work be included to address fuel reduction in more of these areas?

Agency Response:

Fuel breaks are planned along the property boundaries. Terrain tends to slope away and upward from the private land and has a northerly aspect. Fires will tend to move uphill and away from private land. Treatment needs in this area will be evaluated with priority given to treating the fuels on the drier south facing slopes

Letter No: 58 **Comment No:** 1 **Resource:** Veg
Troxel Tom

Comment:

I support Alternative C, and especially the proposed treatments around and adjacent to the private land in Sec 16, T1N, R6E near Hisega.

Agency Response:

Thank you for your support of the Prairie Project and proposed (preferred) Alternative C.

Letter No: 58 **Comment No:** 2 **Resource:** Veg
Troxel Tom

Comment:

I also want to note my support for management activities in MA 3.7. I believe that thinning and stand maintenance in MA 3.7 is essential to achieving the Management Area objective over the long-term.

Agency Response:

Thank you for your comments on management within MA 3.7.

Letter No: 59 **Comment No:** 1 **Resource:** Plan
Hoxie Jim

Comment:

We commend the Mystic District for their professionalism and leadership in developing this project. After reviewing the Alternatives we find that Alternative C will substantially meet the intent of the stated purpose for the project

Agency Response:

Thank you for your support of the Prairie Project and Alternative C.

Letter No: 59 **Comment No:** 2 **Resource:** Veg
Hoxie Jim

Comment:

Pope and Talbot Inc. appreciates the fact that approximately 11,881 acres will be treated with Alternative C and that fuel loading, basal area, and mountain pine beetle risks are being treated aggressively.

Agency Response:

Thank you for your support of the Prairie Project and the proposed (preferred) Alternative C.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 59
Comment No: 3
Resource: Trvl/Rec
Hoxie Jim

Comment:

Alternative C's road package proposes pre-use maintenance on 45 miles, FSR reconstruction on 23 miles and 3 miles of new construction at a total cost of \$402,700. Please review these road costs and assign road improvements based on what is necessary to remove the commercial timber volume. Timber purchasers should not be held accountable for the cost of improving or building road systems that are not necessary for timber removal. Current lumber market conditions do not generate the revenue necessary to pay for road improvements other than those needed to remove included timber.

Agency Response:

The costs displayed under Alternative C are a best estimate at this time. Detailed field work will be conducted prior to issuance of any contracts. Costs will be reviewed and revised at that time, and will depend on the actual decision made for the Prairie Project. We understand the economic issues involved and will seek to minimize costs consistent with the decision and on-the-ground needs.

Letter No: 59
Comment No: 4
Resource: Veg
Hoxie Jim

Comment:

In future DEIS we would like to see a more detailed discussion of projected future yield for each treatment.

Agency Response:

Thank you for your comments. Modeling results are discussed in the Silviculture report held in the project file at the Mystic Ranger District office.

Letter No: 59
Comment No: 5
Resource: Plan
Hoxie Jim

Comment:

Once again, Pope and Talbot does appreciate the professionalism with which the Prairie DEIS has been presented. We look forward to working with the Mystic Ranger District on this project and future projects.

Agency Response:

Thank you for participating in the Prairie Project planning process.

Letter No: 60
Comment No: 1
Resource: Plan
Sierra Club of the Black Hills

Comment:

the Sierra Club as adopted a policy nationwide that no vegetative management utilizing commercial timber sales should be undertaken on any national forest. The Sierra Club also takes the position that fuel and fire hazard reduction on national forest lands should be accomplished primarily through non-commercial thinning and prescribed burn treatments. The Club also believes that any project seeking to reduce fuels and fire hazards should focus immediately on the areas where there is a wildland-urban interface; i.e., the danger to pre-existing private inholdings should be dealt with first. Consequently, as the draft EIS for the Prairie Project is presently written, the Black Hills Group of the Sierra Club favors adoption of Alternate B accomplishing fuels and fire hazard reduction primarily through non-commercial thinning, prescribed burning, and natural processes.

Agency Response:

The policy statement of the Sierra Club regarding vegetative management on any National Forest is noted. Thank you for participating in the Prairie Project planning process and support of Alternative B.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 60 **Comment No:** 2 **Resource**
Plan

Sierra Club of the Black Hills

Comment:

We are aware of the public and political pressures engendered when your agency proposes a management plan to reduce fuels and fire hazards, and that the Forest clearly prefers Alternative C, calling for extensive commercial treatments. Since in all likelihood the Forest decide to adopt Alternative C substantially as outlined in the draft EIS, the Black Hills Group requests that the following comments and considerations be addressed by the decision-maker if Alternative C is adopted.

Agency Response:

Comment noted.

Letter No: 60 **Comment No:** 3 **Resource**
Plan

Sierra Club of the Black Hills

Comment:

The members of the Black Hills Group on the whole prize the "old growth" on the Black Hills and began to press the Forest Service to retain and foster conditions for "old growth" on the Black Hills National Forest it was in reaction to a timber program that we believed was unsustainable, and had converted the Black Hills to a ponderosa pine mono-culture of even-aged tree stands. Our members desire was to retain the remaining old-tree ponderosa pine on the forest and increase opportunities for the forest to move toward a more natural condition through natural processes and non-commercial thinning projects. As things developed, what old growth forest meant historically in the Black Hills was never determined, and the lack of research on the Black Hills led our group into trying to explain the concept here in the context of old growth on the forest of the Pacific Northwest. As a result of additional research done on the historical condition of ponderosa pine forests, and the research on fire ecology spurred by the fire seasons in the western United States, we have refined our view on what old growth forest means on the Black Hills National Forest. The EIS for the most recent LRMP for the Black Hills National Forest contains, what most of our members would feel, is an accurate general description of the historical condition of the forest. Prior to white settlement considerable diversity existed in the pine cover on the Black Hills. Large ponderosa pine trees 250 to 300 years old existed both in dense stands and in smaller clumps throughout the forest. Stands of aspen and burr oak were common in the forest. The forest was shaped by fire and the disturbances of insects and disease. Fires affecting the forest burned cooler, tending to stay on the ground. The thick bark of the older pines tended to be fire resistant and the fire served to repeatedly thin the regenerating under story. Fires or insect disturbances large enough to replace entire stands of trees created habitat for other species of plants and wildlife by allowing the spread of aspen and other browse and forage plants. Structural changes in the forest began with the settlement of the Black Hills. At present the original old-tree component of the forest is almost entirely gone. Tree densities are higher, deciduous tree and shrub species have been diminished, and the age-classes of the pine stands are more uniform. We believe this to be the result of the national policy of fire suppression, and commodity programs on this forest. Management has favored the ponderosa pine. Our members recall past practices that removed aspen, oak, and other deciduous species from the forest in order to promote timber growth; natural meadows and parks have been allowed to convert to ponderosa pine stands; the cutting rotation on tree stands has been shortened; and we have seen grazing have a detrimental impact on riparian areas through the loss of shrub and associated hardwood species. The trick now is to move the forest back into its historical condition, and achieve that balance as quickly as possible. This is the purported purpose of the Prairie Project, but as usual with forest planning, the devil is in the details. Putting aside arguments about the use of commercial logging, the Black Hills Group would like the decision-maker to address the

Agency Response:

The comments regarding your organizations view of old growth forest condition on the Black Hills National Forest has been noted and considered.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 60 **Comment No:** 4 **Resource:** Plan

Sierra Club of the Black Hills

Comment:

MONITORING: In our opinion the monitoring provisions for Alternative C are totally inadequate. The activities, treatments and impacts under Alternative C are so sweeping that several site-specific Forest Plan amendments will be required to implement the alternative. In and suggesting mitigating measures, we believe that planners have the obligation to identify the specific necessary monitoring protocols. It is essential that the decision-maker and public are advised how the agency can determine that mitigation measures are working, and that the projects are within the limits approved in the ROD. The Forest Plan amendments are said to be site-specific, and most of the impacts from the proposed amendments will affect wildlife. The Forest Plan, and its Phase I and II amendments, are designed to meet the requirement that the Forest Service maintain habitat to support viable populations of wildlife. Certain species such as the goshawk, are at critical numbers in the Black Hills, and project activities impacting the species in the project area require careful analysis. Both mitigation measures and monitoring protocols such be designed on the analysis provided in the EIS. Such a disclosure would enable the public and the decision-maker to judge their adequacy.

Agency Response:

Monitoring is discussed on page 32 of the DEIS. The Prairie Project Monitoring Plan is provided in Appendix C of the DEIS. Monitoring protocols (USDA Forest Service 2003) have been developed for all MIS as well as numerous habitat components such as late succession, snags, down woody material, etc., as directed by the Forest Plan (pages IV-1 through IV-7). Results of monitoring activities are published annually (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). Design criteria and mitigation are discussed on page 32 of the DEIS. Appendix B lists design criteria and mitigation measures specified for use when implementing the action

Letter No: 60 **Comment No:** 5 **Resource:** Wildlife

Sierra Club of the Black Hills

Comment:

GOSHAWKS: Alternate C is going to have severe negative impacts on the goshawk populations in the Black Hills. Because this species numbers are so low, we fear that if the project is implemented with the proposed Forest Plan amendments concerning goshawk habitat, the viability of the species across the entire forest will be threatened. In ruling on the Sierra Club's appeal of the revised Forest Plan in 1999, the Chief of the Forest Service stated, "The standards and guidelines established in the Revised Plan for maintaining the viability of the northern goshawk are in adequate to meet the intent of the NFMA, its implementing regulations, and FSM direction." These deficiencies were a driving force in the Phase I amendment process. The northern goshawk is classed as a sensitive species, and any alteration of habitat that goshawks are using in the Black Hills should be avoided. This is especially important since the Biological Assessment/Biological Evaluation for the Phase I amendment pointed out that there was very little data on goshawk population and demography for the Black Hills, and there was no certainty there was a viable population on the forest at that time. That was three years ago, and we have not seen an accumulation of Black Hills data that would enable planners of the Prairie Project to request site-specific amendments to the Forest Plan which adversely impact goshawk habitat.

Agency Response:

The commentator's opinion that treatments proposed in Alt. C will "have severe negative impacts on the goshawk population in the Black Hills" and that "if the project is implemented ... the viability of the species across the entire forest will be threatened" is noted. The goshawk is addressed in the Prairie DEIS (pgs. 144-149), and in the Prairie BA/BE (Project File). Northern goshawk nesting activity is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). The northern goshawk is also monitored by the Rocky Mountain Bird Observatory (Panjabi 2002, 2003), although several more years of data will be required before conclusions regarding habitat use and population size or trend can be made. In addition, surveys for this species are conducted in areas with potentially suitable habitat, but where there are no known territories. Species viability is beyond the scope of the Prairie Project EIS, as is the distribution of the population or habitat across the Forest.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 60 **Comment No:** 6 **Resource:** Wildlife

Sierra Club of the Black Hills

Comment:

MOUNTAIN LIONS: We are aware from information provided by South Dakota Game, Fish & Parks that mountain lions are making extensive use of portions of the Prairie Project area. The draft EIS contains non analysis of the impacts of the project on this species for any of the alternatives considered. This oversight must be corrected. Mountain lions have requirements for screening, hiding and security cover, just as do their prey species. Vegetative treatments that severely reduce or eliminate this habitat can push lions out of the project area; most probably in the same direction that their prey species went. We would urge the Forest Service immediately consult with South Dakota Game, Fish & Parks about the presence of mountain lions in the Prairie Project area, and the anticipated effects of the implementation of the project's alternatives on the mountain lion. Our group does not favor implementation of any activity or treatment which would push mountain lions out of wildland areas and into

Agency Response:

The mountain lion is addressed in the Prairie DEIS (pg. 151). Commentor's concerns regarding this species are

Letter No: 60 **Comment No:** 7 **Resource:** Veg

Sierra Club of the Black Hills

Comment:

STAND TREATMENTS: Although heralded as a fuel and fire hazard reduction project, the Prairie Project is at heart a massive timber sale. The Forest's rationale for using commercial logging appears to be two-fold: Commercial logging is necessary in order to generate enough money to see the project through, and commercial logging is the quickest way to remove trees from the forest and move it toward its historical open condition. The silviculture treatments that will be applied across the project area are the same treatments associated with other timber sales on the Forest; the distinguishing characteristic in this case appears to be that a lower basal area will be prescribed. Alternative C also aggressively creates openings in the project area through meadow restoration and patchcuts. If the Forest Service is going to attempt to move the forest in the project area toward its historic condition, we ask why the Forest Service is not going all the way? Consideration should be given to treating tree stands so as to mimic the random mosaic that fire and insects would have created in the project area. This would be preferential to simply cutting stands to eliminate ladder fuels and reduce basal area. As projected, we believe that implementation of Alternative C is going to result in large even-aged stands of ponderosa pine, distinguishable from the rest of the forest only in that trees will be spaced further apart and subsequently easier to harvest. Study should be given to opening the forest up if this is a valid rationale for action. Historic meadows and parks in the project area should be identified and encroaching pine eliminated. The Prairie Project area is so large that it contains multiple species habitats. (We have observed ponderosa pine/white coralberry and ponderosa pine/bearberry habitats, as well as aspen and burr oak) Consideration should be given to treating each of these habitats so as to open them and restore stands containing trees of mixed age classes and varying densities. Such actions would have the short-term effect of removing a lot of timber and lesser trees from the project area. And if done correctly, would require that harvest rotations on the area as a component in maintaining the historic forest condition, insuring the random mosaic of tree stands and opening continues to evolve. Although the area would not be able to sustain as heavy a timber harvest in the future as it does now, the project area would achieve its goal of providing a fire resistant buffer for urban interface areas. We also would request that the agency use interdisciplinary teams to design vegetative treatments on all cutting units in the project area. In order to move the forest toward its historic condition the stand treatments will require collaboration by silviculturist, a wildlife biologist, a botanist, and a hydrologist.

Agency Response:

Two of the alternative treatments were designed to reduce catastrophic wildfire hazard. Alternative C with commercial harvesting recovers value from product removed thus recouping some of the cost of the project. Regeneration harvests, meadow and hardwood stand enlargement, enlarging small groups of hardwoods within existing pine stands and prescribed burning was designed to reduce large areas of even-aged ponderosa pine. The interdisciplinary team process is used to design vegetative treatments.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 60 **Comment No:** 8 **Resource:** Plan

Sierra Club of the Black Hills

Comment:

SUPPLEMENTAL EIS FOR FOREST PLAN: Alternative C will seek numerous site-specific amendments to the Forest Plan, indicating that the activities in a 29,000 acre project area are going to have significant impacts not considered or foreseen when the Forest Plan was adopted. Additionally, since 1988 there have been large areas of the Black Hills National Forest that have been burned over by wildfire. Lands in adjacent jurisdictions have also been burned by wildfires, most notably, in Custer State Park, the Westberry Trails Fire immediately west of Rapid City, and last years fires around Deadwood. When all fire acreage is totaled for the Black Hills area, we estimate that 15% - 20% of the area has been altered by wildfires. Additionally, the Roadless area and the Needles and Grizzly Timber Sales. And the 10th Circuit Court of Appeals has entered a decision that removes the management of the Norbeck Wildlife Preserve from the constraints of the NFMA. These events have forest-wide implications. For example, whether the timber program outlined in the Forest Plan can be considered to be sustainable after 20% of the forest has burned and/or treated for fuel and fire hazard reduction can be questioned. Likewise, has the alteration of wildlife habitat in the areas impacted by these events impacted the viability of species on the forest? We suggest that these are cumulative impacts, which together with the impacts of Alternative C, should be re-analysed in a supplemental Forest Plan EIS.

Agency Response:

Your comment regarding the need for a supplemental EIS for the Forest Plan has been noted and forwarded to the appropriate Forest staff.

Letter No: 61 **Comment No:** 1 **Resource:** Plan

Black Hills Forest Resource Association

Comment:

We would like to begin with a strong commendation to you and your staff on the Mystic Ranger District for your leadership and forethought in constructing and proposing a project such as Prairie. We are entirely supportive of the pragmatic, results-oriented approach Prairie employs toward reducing the risk of catastrophic fire and insect infestation. The manner in which the District has engaged, educated, and responded to the public through meetings, discussions, media, and changes to the proposed action is also highly praiseworthy.

Agency Response:

Thank you for your support and participation in the Prairie Project planning process.

Letter No: 61 **Comment No:** 2 **Resource:** Plan

Black Hills Forest Resource Association

Comment:

We agree with Prairie's stated Purpose and Need, and fully support Alternative C, the proposed action, as a means by which to address these issues. Prairie's proposed action offers a successful marriage of fuels, insects, wildlife, silvicultural, and socio-economic management objectives.

Agency Response:

Your support for Alternative C is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 61 **Comment No:** 3 **Resource**
Plan

Black Hills Forest Resource Association

Comment:

We do not support any portion of Alternative B. Aside from its incompatibility with the fundamental statutory requirements of NFMA and MUSYA, the activities it proposes would fail to sufficiently meet the stated Purpose and Need of reducing crown fire potential. Under Alternative B, an unacceptably high risk to communities, forests, wildlife habitat, and water quality would persist within the project area. Furthermore, the prospects for the Mystic Ranger District obtaining the taxpayer funds necessary to complete the treatments in Alternative B are exceedingly grim. We concur with the District's preference for Alternative C.

Agency Response:

Your organizations opposition to Alternative B is noted.

Letter No: 61 **Comment No:** 4 **Resource**
Wildlife

Black Hills Forest Resource Association

Comment:

We support the site-specific Amendments the District has proposed to goshawk, big-game, and MA3.7 Forest Plan direction as necessary for the implementation of Alternative C. While we do not believe the letter or intent of current Forest Plan direction expressly prohibits conducting treatments in areas such as goshawk PFA's or in MA3.7, we understand the District's logic in proposing these amendments. The District does well to be forthcoming with the public about potential effects to wildlife, and we believe the 'balance of harms' to potentially affected species weighs much more heavily under the scenario of catastrophic fire than under the proposed treatment activities. Wildlife habitat, especially for species dependent upon dense forest conditions, is better provided-for in the long-term if the risks of catastrophic wildfire are reduced.

Agency Response:

Thank you for your comment and support of Alt. C.

Letter No: 61 **Comment No:** 5 **Resource**
Plan

Black Hills Forest Resource Association

Comment:

Similarly, the desired mature forest structural conditions of MA3.7 will not persist on the landscape indefinitely, and we are encouraged that the District has elected to preserve these conditions through active management. All in all, however, we believe the District could do a better, clearer job of explaining the justification for the proposed Amendments. Ideally, this would simply mean adding to the discussion offered within Chapter 2 on Alternatives; consider describing in plain-language the significance of a site-specific Amendment, and including a broad introductory statement explaining why the Amendments are necessary.

Agency Response:

Your comment regarding management for mature forest in MA 3.7 is noted. Further clarification and discussion of the proposed FP Amendments is provided in the FEIS and ROD.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 61 **Comment No:** 6 **Resource:** Wildlife

Black Hills Forest Resource Association

Comment:

Repeatedly and at great length, we have stated our opposition to the asinine requirement of “assumed presence” contained within FSM Supplement 2672.102. In the instance of the Prairie DEIS, however, the District seems to have been able to accomplish its resource management objectives in spite of “assuming” the presence of a number of goshawk nesting and PFA stands, and “assuming” that the project area is snag-deficient. Given the design of Alternative C, and the dire nature of the need to reduce wildfire risk in the project area, we do not object to these “assumptions” in this instance. In the long-term, however, we believe the Black Hills NF needs to find a more credible way to deal with acquiring sensitive species and MIS survey data than simply “assuming” one thing

Agency Response:

The Forest Service Manual supplement cited by the commentor (FSM, Black Hills Supplement 2600-2001-1) “clarifies language included in the Washington Office’s 1999 Black Hills National Forest Revised Plan Appeal Decision,” and “will remain in effect until the Black Hills National Forest Land and Resource Management Plan – Revised (1997) is amended (Phase II).” The assumption that the project area is deficient in snags is a legitimate and logical assumption in that it is based on surveys that have been conducted in numerous other project areas on the Mystic District in the past decade (data held in District files). Monitoring protocols have been developed and recently updated (US Forest Service 2003), as directed by the Forest Plan (pgs. IV-1 through IV-7) for all Management Indicator Species (MIS) and sensitive species, as well as numerous habitat components such as late succession, snags, down woody material, etc. In addition, the Forest has contracted with the Rocky Mountain Bird Observatory to provide statistically rigorous, long-term population trend data on most diurnal, regularly breeding bird species in the Black Hills. However, since this monitoring program is only in its third year, it is too soon to assess whether population sizes are changing, and if so, whether trends are positive or negative. It will take several years before any conclusions can be made from data collected.

Letter No: 61 **Comment No:** 7 **Resource:** Trvl/Rec

Black Hills Forest Resource Association

Comment:

Alternative C’s proposed suite of road work seems inordinately large and expensive. We encourage the District to look for ways to minimize road costs, and remind the District that current market conditions do not lend themselves to timber sale revenues paying for road improvements other than those needed to remove included

Agency Response:

We understand the economic issues involved and will seek to minimize costs consistent with the decision and on-the-ground needs.

Letter No: 61 **Comment No:** 8 **Resource:** Trvl/Rec

Black Hills Forest Resource Association

Comment:

Generally, we support the travel/recreation management proposals of Alternative C (and vehemently oppose those of Alternative B). However, we believe much more work is yet to be done in bringing together various motorized and non-motorized recreation interests to provide for the opportunities each requires from the BHNH.

Agency Response:

Your support for the travel/recreation management options in Alternative C and opposition to Alternative B is noted. We agree that more work is needed to bring together motorized and non-motorized interests and encourage interested users to collectively work on these issues.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 61 **Comment No:** 9 **Resource:** Fire/Fuels

Black Hills Forest Resource Association

Comment:

We also encourage the District to offer a quantitative estimate of the increased fire suppression response times that will be associated with the large non-motorized recreation emphasis area in the central and southern portion of

Agency Response:

Initial response times will vary from 15 minutes to over an hour depending upon the location of initial attack resources, status of initial attack resources and time of day. The area is well roaded and it was the conclusion of the Interdisciplinary Team that travel management would not have a significant effect on access in all of the

Letter No: 61 **Comment No:** 10 **Resource:** Econ

Black Hills Forest Resource Association

Comment:

We were pleased to see that the District attempted to evaluate the socio-economic costs of the No-Action. Too often, the analysis of the No-Action is a unidimensional statement of “no significant immediate impacts”, when this is clearly not the case. To better quantify the ‘costs’ of the No-Action, the District might cite its own BAER report on the Battle Creek Fire.

Agency Response:

Your comment regarding the potential costs of no action is noted. The Battle Creek Fire BAER Report provides estimated costs of post-burn emergency treatment/rehabilitation. The cost of no-action was about \$388,000 and the cost of action (treatment) was \$326,000.

Letter No: 61 **Comment No:** 11 **Resource:** Veg

Black Hills Forest Resource Association

Comment:

Effects Analysis: Here again, we compliment the District on its discussion of the No-Action and the environmental consequences that could be incurred upon water quality and flow regimes, soils, wildlife, and air quality from the implementation of this Alternative. We encourage the District to incorporate similar analyses in future project

Agency Response:

Your suggestions have been noted. Thank you for your comments.

Letter No: 61 **Comment No:** 12 **Resource:** Fire/Fuels

Black Hills Forest Resource Association

Comment:

The treatments proposed in Alternative C and the manner in which they’re referred-to in the EIS may have given the public the impression that long-term yield would decline under the proposed action. We do not believe this is the case, and encourage the District to disclose more detailed information on growth and yield projections for each

Agency Response:

Comment noted and considered. Reference is made to growth modeling data/findings held in the project file.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 61 **Comment No:** 13 **Resource:** Fire/Fuels

Black Hills Forest Resource Association

Comment:

We appreciate the District's discussions of historic or pre-settlement forest structural conditions compared to current conditions in the Fuels portion of the Effects Analysis, especially in the context of Alternative C's proposed treatments. We encourage the District to incorporate similar discussions with future project decisions as

Agency Response:

Comment is noted. Thanks for your participation and interest in the Prairie Project.

Letter No: 61 **Comment No:** 14 **Resource:** Wildlife

Black Hills Forest Resource Association

Comment:

We believe the management of thermal cover stands in isolated, 'protected' pockets as described in the Fuels portion of the Effects Analysis has tremendous merit for longer-term management strategies on the Black Hills NF. Given the Black Hills' disturbance regime and historic accounts of forest condition, it is not likely that stands that would be classified today as thermal cover existed on the landscape at any time in history in either the structure or extent prescribed by current Forest Plan direction. The District should take great care to monitor and document the real, on-the-ground habitat effectiveness for big game species to help evaluate this means of forest

Agency Response:

Comment noted.

Letter No: 61 **Comment No:** 15 **Resource:** Wildlife

Black Hills Forest Resource Association

Comment:

The Final EIS should more prominently mention the fact that, under all Action Alternatives, elk, whitetail, and mule deer habitat effectiveness realizes an increase over current conditions. The public, unless they've waded carefully through the over 150 pages of Effects Analysis, may have received the impression that habitat would suffer as a result of the project (Alternative C in particular). We suggest that a brief discussion of big game habitat is included either within the discussion of Alternatives' effects on wildlife or alongside the proposed site-specific Amendments.

Agency Response:

Reference to big game was added to summary of effects to wildlife habitat in Chapter 2. Big game habitat and the effects of the alternatives are discussed in the Prairie DEIS (pgs. 157-163).

Letter No: 61 **Comment No:** 16 **Resource:** Heritage

Black Hills Forest Resource Association

Comment:

We encourage the District to stipulate the clear designation of archaeological sites on the timber sale area maps. This way, the prospective purchasers are able to 1) avoid damaging these sites once harvest operations begin, and 2) better estimate the work that would be required to avoid the location of these sites.

Agency Response:

Heritage resources are identified to all Presale and Sale Administrators and are located on Timber Sale Area Maps as areas for avoidance. These areas are explained and identified to the purchaser prior to implementation of harvest activity. Sites are identified on the ground as needed for avoidance. Sites are not labeled as such on the maps to avoid widespread identification of these resources for their protection.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 61 **Comment No:** 17 **Resource:** Hydro

Black Hills Forest Resource Association

Comment:

We understand and appreciate the need to operate on some sensitive soil types only during dry or frozen conditions. However, it has been a plague of the Black Hills National Forest that these restrictions are placed needlessly upon each and every acre of each and every forest project. We encourage the District to ensure that these restrictions are limited to the soil types upon which they are truly needed.

Agency Response:

Operations restrictions are not placed on every acre of the projects. The soil surveys for the appropriate county are consulted and if the soils are subject to compaction, have a high erosion hazard rating or a high mass wasting potential, restrictions are placed on operations so they operate on the soils when they are dry or frozen. This is designed to protect soils.

Letter No: 61 **Comment No:** 18 **Resource:** Econ

Black Hills Forest Resource Association

Comment:

Although the proposed action recovers much of the cost associated with its prescribed fire, noncommercial thinning, and fuels treatments, the project still requires \$1.9 million in additional funding. The BHFRA extends the District any and all assistance we can offer toward procuring the needed funds. Please keep us apprised of the funding needs for this project.

Agency Response:

The BHFRA offer of assistance to procure additional funding needed to fully implement the proposed activities in the Prairie Project area is noted--thank you.

Letter No: 61 **Comment No:** 19 **Resource:** Plan

Black Hills Forest Resource Association

Comment:

Thank you for your time and consideration. Once again, we applaud you for proposing such a well-designed project, for effectively involving the public, and for displaying strong leadership in doing-so.

Agency Response:

Thank you for supporting the Prairie Project effort.

Letter No: 62 **Comment No:** 1 **Resource:** Plan

Gray Archie

Comment:

I would like to express my support for implementation of alternative C.

Agency Response:

Your support for Alternative C is noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
64	2	Trvl/Rec
Gourde		Darrin

Comment:

As far as Travel Management, I feel that no land should be closed to select user groups and open to others. Why should I, as a taxpayer, be denied the use of select public land for my recreation when others are allowed to use the land for theirs? If laws are being broken we need to find a way to enforce them. I agree with seasonal closure of land for wildlife reasons but it should be closed to all users during that time.

Agency Response:

Thank you for your comments regarding the Prairie Project proposal. There are currently four alternatives that deal with travel management with a slightly different slant on how to most effectively manage the forest. User's comments are being considered as well as what is best for the resources protection. Enforcement is everyone's responsibility and cannot be effectively controlled by only one group. Closing entire areas to every user is an impossible task especially in the vicinity of Rapid City.

Letter No:	Comment No:	Resource
64	3	Trvl/Rec
Gourde		Darrin

Comment:

The following are a couple of my recommendations to help deal with the growing problems between user groups and property owners: Education - Currently there are no preferred areas for each group. If a group is shown where you prefer them to ride I think, for the most part, they will voluntarily do so. Teach four-wheel users to stay off single tracks. Once the majority of users know this and abide by it, they will come down hard on those who don't. This advantageous is dispersing the use over the forest surface. Encourage business (both resort and motorized sales) to educate out-of-area users. Requiring all wheeled users to purchase a yearly registration could fund this.

Agency Response:

Thank you for your suggestions. Education is important in dealing with motorized and non-motorized issues. The Prairie Project decision should consider the role of education in travel management. Requiring all-wheeled users to purchase a yearly registration is beyond the scope of this project. It is a State function—not that of the National Forest—to establish registration requirements within that state.

Letter No:	Comment No:	Resource
64	4	Trvl/Rec
Gourde		Darrin

Comment:

The following are a couple of my recommendations to help deal with the growing problems between user groups and property owners: Have noise limits near private property and Hiking Areas- If motorized users heavily use an area and it is close to residential and designated hiking areas, create and enforce a noise limitation. This would eliminate many complaints pertaining to our recreation. The dirt bike manufactures are currently working to lower the noise made by their products.

Agency Response:

Noise is certainly an issue regarding motorized use adjacent to private property and near hiking trails. Setting a noise limit is an interesting concept, and could be explored as a method for managing conflicts. We would welcome the development of lower noised dirt bikes and are happy to hear that manufacturers are working on reducing noise emissions.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 69 **Comment No:** 1 **Resource:** Plan
Bing Raymond

Comment:

I believe alternative C is the best choice and there will be more and more people moving into the project area in years ahead so more forest and housing protection will be needed. The Black Hills is a good place to live and protection of the areas is real important, very few forests like the Black Hills National Forest.

Agency Response:

Thank you for your comments on the Prairie Project and support of Alternative C. Your comments regarding the importance of protecting the forest, development, and people in the area is noted.

Letter No: 69 **Comment No:** 2 **Resource:** Fire/Fuels
Bing Raymond

Comment:

Fires season won't wait and the quickest access to the fire area [important] access roads for fire fighting equipment should be a priority. As slurry bombers and helicopters may be in short supply, much of the fire fighting will be done by ground crews. The main roads may be crowded hence the roads to the forest fires areas is a good

Agency Response:

Even the most restrictive alternative would still have a road density of over 2 miles of road per square mile of land. This still represents a well roaded area and it was the conclusion of the Interdisciplinary Team that travel management would not have a significant effect on access in all of the alternatives.

Letter No: 69 **Comment No:** 3 **Resource:** Fire/Fuels
Bing Raymond

Comment:

I think a helicopter port near Pactola resevoir and another at Sheridan Lake would help a lot, can go into action

Agency Response:

Comment is noted, but is outside the scope of this analysis.

Letter No: 70 **Comment No:** 1 **Resource:** Fire/Fuels
Teets Kurt

Comment:

For the Forest thinning portion of this project, I am in favor of alternative "C". This provides the greatest thinning and clearing of forest to resist crown fire potential.

Agency Response:

Support for Alternative C is noted. Thanks for your participation and interest in the project.

Letter No: 70 **Comment No:** 2 **Resource:** Trvl/Rec
Teets Kurt

Comment:

For the Travel and recreation portion, I am in favor of alternative C. As a dirt bike rider in the hills, I would like to see very little closed to ORV use. I have no problems sharing trails with mountain bikes, etc.

Agency Response:

Thank you for your comments on the Prairie Project proposal and your support for Alternative C. Sharing of recreation values is a good thing.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
74	4	Trvl/Rec
Kirby		Paulette

Comment:

To allow open access to specific regions for specific recreational uses is 'selling out' on the forest. These are disturbing plans. All forestland should be strictly monitored and regulated by the forest service. The ecosystem is not regional and the outcomes will be permanent and disturbing. Specific recreational groups are not knowledgeable and necessarily respectful of the ecosystem. The forest service has some reputation for being strict about land use. With the ongoing struggles that exist, this reputation should not be compromised. If anything, the reputation should be strengthened. The goals you have listed in the draft: protect, provide, and emphasize...are reasonable.

Agency Response:

Thank you for your comments to the Prairie Project proposal. The Forest Service monitors and regulates the Black Hills National Forest but only to the capacity and extent that is feasible. The Prairie area is only a small portion of the entire forest to manage and over the years requests to the public to support our efforts has received mixed response. Change is inevitable, be it good or bad, and how the public/users respond will help determine the future/long term management of this area.

Letter No:	Comment No:	Resource
74	5	Trvl/Rec
Kirby		Paulette

Comment:

There is absolutely no reason to build additional roads. The more roads that are closed, the better. There are roads everywhere. We have reputations for never taking the same route twice. There are so many choices as it is. Every day in the outdoors is an adventure. And life is good.

Agency Response:

Roads are everywhere and good management should only keep the roads that are truly needed for resource management and public access for their enjoyment and livelihood.

Letter No:	Comment No:	Resource
74	6	Trvl/Rec
Kirby		Paulette

Comment:

Motorized vehicles with improved ability for off-road access are a growing trend. Their use may only get worse. Forest and backcountry use should be strictly limited and regulated to specific roads and regions. These regions should be respectful of the lives in the forest: wildlife and human. They should be in areas that are not disruptive to the ecosystem. Why can't they be placed in areas off the interstate or built up in prairies along the edges of civilization. Why in the forest? The forest is permanently altered by their use. There needs to be increased provision of recreational opportunities that are currently not available. These include trekking, backcountry campsites, wildlife and birding enthusiasts. The region is currently biased to motorized use and hunting use. All other recreations have to make sacrifices for these uses.

Agency Response:

As stated on page 180 of the DEIS, off-road motorized sales and use is a growing trend within this and other areas. Your general opposition to off-road motorized use within the Forest is noted. There are many opportunities for non-motorized uses within the Project Area and within the Black Hills National Forest. Page 177 of the DEIS acknowledges that past management practices, road building, and established uses within the Prairie Project Area have created an environment that more closely meets the motorized user preferences.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 75
Comment No: 4
Resource: Plan
Clauson Sam

Comment:

Another area of concern that needs to be addressed more fully, is how this plan will be affected by surrounding homeowners and subdivision planners. A strong working relationship must be established between the USFS and county planners to insure that the continued helter-skelter development of subdivisions in these drainage areas be corrected. The very fact that some of these subdivisions are being created in this area without adequate water supplies is appalling, and even though it is not directly a problem of the FS, it certainly is one of dire consequences. Also, there should be tougher restrictions on building standards, such as fire resistant roofing and siding, landscaping, and access. A better plan must be made so that potential homeowners can't just demand access to isolated holdings across the lands of the US, owned by all citizens. Also, if this plan is mainly to help the community, the FS should first work with homeowners who take their own steps for protection first, and work with community leaders for a joint FS/homeowner plan.

Agency Response:

Cooperative efforts with the South Dakota State Divisions of Wildland Fire and Forestry as well as local city and volunteer fire departments will receive increased emphasis under all action alternatives. The objective is to work with and encourage private landowners/residents to reduce fuel hazards on and near their property.

Letter No: 75
Comment No: 5
Resource: Veg
Clauson Sam

Comment:

In studying maps furnished to us by your District, it has become very clear that previous logging plans that involve a large percentage of the area, were obviously written to sustain future commercial timber harvest, with some wildlife emphasis, but obviously not for protection of the wildland/urban interface. We urge that whatever plan is now adopted, clearly show the mosaic previously governed by fire, with a broader range of age classes of pine, especially old growth, expansion of aspen & bur oak, as well as more of the shrub/fruit species preferred by wildlife. Some of the areas mapped have been commercially harvested as recently as 1996, and though a drought & fire situation has existed, the emphasis on these old sales has been for future commercial harvest, rather than for protection of the wildland/urban interface. Ongoing projects should be modified to reflect the changed direction.

Agency Response:

Your suggestions have been noted. Alternatives B and C have been designed primarily for reducing the fuels and fire hazard in the wildland/urban interface, but also provides for expansion of hardwood communities and an increase in age class diversity. Prescribed burning and treatments opening up the pine stands and treating logging debris will increase forage for wildlife.

Letter No: 75
Comment No: 6
Resource: Trvl/Rec
Clauson Sam

Comment:

This area is also heavily abused by so-called "target" shooters who will shoot almost anything, at all hours of the day and night. Greater protection for other users and nearby homeowners from stray bullets and noise should be undertaken. Finally, to further emphasize the motorized travel problems, I would strongly urge that more seasonal and permanent road closures take affect immediately, rather than to wait until the project is completed.

Agency Response:

Most target shooters are responsible users that clean up their trash, and respect adjacent landowners and other users. There are areas that have been "abused" by target shooters. This is discussed on page 179 and 182 of the DEIS. Your desire to see immediate seasonal and road closures rather than after the project is completed is

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
76	1	Plan

Biodiversity Conservation
Alliance

Comment:

Biodiversity Conservation Alliance and Jeremy Nichols submit these comments on the Draft Environmental Impact Statement ("DEIS") prepared for the Prairie Project. While the Black Hills National Forest ("BHNF") has taken some steps to address concerns over the environmental impacts of the Prairie project, we do have many concerns over the proposed action and the action alternatives. Although we sincerely appreciate the FS developing Alternative B in response to concerns over excessive commercial timber harvesting and the environmental impacts associated with such activities, it seems that some major points and concerns have been overlooked. Additionally, it seems the FS is seriously misleading the public into believing that fire is some great, natural enemy that must be subdued, and that timber harvesting and thinning are somehow needed to address the risk of fire in the Black Hills. Indeed, on page xii of the DEIS, the FS presents a bright color picture of a forest fire and we cannot help but see this as an attempt to stir up unnecessary paranoia over fire in the Black Hills and

Agency Response:

Comments noted. The Prairie Project planning process embodies a major effort on the part of the Forest Service to carry out its statutorily management responsibility. This includes proactively addressing issues such as the potential for catastrophic wildfire and working to resolve the complex travel and recreation use issues that exist in this ponderosa pine dominated urban interface area.

Letter No:	Comment No:	Resource
76	2	Plan

Biodiversity Conservation
Alliance

Comment:

While we appreciate the need to work with people living in the forest and to not act recklessly, we cannot help but see the Prairie Project as simply "giving in." It seems like the FS just wants to be able to say, "We did something," so that it can appease a few landowners and local elected officials that are not entirely familiar with existing fire science and ecological studies on the Black Hills. However, in doing so, the FS is not only ignoring a wealth of science that clearly demonstrates effective and cost-effective ways of protecting homes, property, and lives from forest fires, but also ignoring the fact that these are our public lands – valued, owned, and shared by everyone in the United States. The Black Hills National Forest does not belong to the State of South Dakota, the City of Rapid City, or to Pennington County, yet it seems like it is managed that way.

Agency Response:

Comments noted. See agency response to comment 76/1. We agree that the Black Hills National Forest is public land for all to use and enjoy. Nevertheless, it is incumbent upon this agency to give responsible and realistic consideration to how the conditions and management of the National Forest directly and immediately affects the local economy, recreational users, and landowners who live and work here year around.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 3 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

We wish someone with the agency would have the backbone to do what's right for the Black Hills and the people living there. Instead of empty promises, why doesn't the FS just stick to what its own scientists have already found. And, instead of misleading the public into believing that logging and thinning can actually affect fire behavior in the Black Hills, why doesn't the agency flat out say that fires will continue to happen regardless of what is done. Indeed, while the FS claims that fire suppression has somehow altered the forests of the Black Hills, it seems that fires have continued to burn in the Black Hills throughout the past century. The graph on page 2 of the DEIS shows that fires burned in the Black Hills throughout the 20th Century and continue to burn today. Given that the Black Hills has been extensively logged, thinned, and roaded in the past century, it is difficult to find any weight in the FS's conclusions that more logging and thinning will have any effect on future fire behavior.

Agency Response:

EIS acknowledges on page 35 of the DEIS that it is not possible to prevent fires from occurring. Research and experience has shown that it is possible to affect fire behavior with vegetation management. Pages 113 and 114 list management actions that will be used to increase effectiveness in treating the vegetation to reduce crown fire

Letter No: 76 **Comment No:** 4 **Resource:** Plan

Biodiversity Conservation
Alliance

Comment:

Overall, we are very disappointed with the entire Prairie Project because it perpetuates the myth that logging and thinning can affect fire occurrence and behavior in the Black Hills and fails to adequately address the threats fire poses to homes, property, and lives. Instead of working with landowners and state and local governments to protect homes and property by creating defensible spaces, the FS has instead disguised a commercial timber sale as a "fuels reduction" project.

Agency Response:

Comments noted. The Prairie EIS discloses the effects of various vegetation treatments to reduce the fuels and fire hazard in the project area. These effects are based on interdisciplinary analysis, scientific literature and first hand observation of local conditions and experience. Cooperative efforts with the South Dakota State Divisions of Wildland Fire and Forestry as well as local city and volunteer fire departments receive increased emphasis under all action alternatives. The objective is to work with and encourage private landowners/residents to reduce fuel hazards on and near their property. It should be obvious to most readers of the DEIS that the agency repeatedly (in tables and text) has disclosed that commercial timber volume is generated from vegetative treatment at varying levels depending on the action alternative.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 5 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

The FS continues to ignore its own fire science, which has found that unless fuels treatments are conducted within 100-200 feet of homes and possibly within ¼ miles of larger communities, no protection can be guaranteed or assured. While the FS claims that findings by Jack Cohen ignore other potentially adverse impacts associated with wildfires (DEIS, p. 3), we are under the impression that the FS is most concerned about public safety and protecting homes, other structures, and communities. We are also under the impression that the Prairie Project is about protecting property, homes, other structures, and human lives. We request the FS more clearly articulate and present the purpose and need of the Prairie Project – is to protect people, is to eliminate wildfire, is it to control fire, is it simply to reduce “fire risk?” If the Prairie Project is about reducing fire risk, then the FS needs to explain that no protection can be assured for property, homes, and other structures because treatments under all action alternatives are not designed to provide such protection.

Agency Response:

The Forest Service does recognize that an effective way to protect homes and buildings is to manage fuels within 200 feet of the building. The Forest Service has been active in disseminating this information but does not have the authority to manage private property. Protecting property, homes and human lives are an important part of the Prairie project but the EIS is also addressing the impacts that large, catastrophic fires are having on the vegetation, aesthetic, wildlife, soils and watershed resources.

Letter No: 76 **Comment No:** 6 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

The FS has failed to address the fact that several large fires that have burned on the BHNH in recent years have burned in areas that have experienced extensive logging and thinning. The Jasper Fire for instance, burned in an area that experienced 24 commercial timber sales between the years 1987 and 1997, removing a total of 184 million board feet and thinning who knows how many acres. At the least, this raises serious questions over the effectiveness of the Prairie Project in affecting fire behavior and reducing “fire risk” and needs to be seriously addressed (See also Attachment to these comments). Indeed, recent reports have found that “fuels treatments” such as what is being proposed through the Prairie Project actually have little to no effect on fire behavior, risk, or occurrence. The FS also needs to address the fact that other fires, such as Grizzly Gulch, Elk Mountain, Battle Creek, and others, have also burned in areas that have experienced extensive logging and thinning and that a significant level of uncertainty exists over the effectiveness of the proposed treatments.

Agency Response:

Depending upon the type and method of management, vegetation management can increase or decrease the susceptibility of a forest to high intensity crown fire. Not all silvicultural prescriptions are alike and they can vary dramatically depending upon the management objectives. Logging and thinning techniques vary and can significantly affect surface fuel loadings. Research and experience has shown that it is possible to reduce fire intensities with vegetation management. Pages 113 and 114 of the DEIS list some of the management actions that will be used to increase effectiveness in treating the vegetation to reduce crown fire hazard.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 7 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

The FS severely misrepresents the risk of fire on the BHNH and the existing conditions in the forest. While the occurrence of surface fires in the Black Hills is well documented, particularly by the research of Peter Brown and Carolyn Sieg, there is no scientific basis for the assertion in the DEIS that these surface fires were frequent or that they would have prevented crown fires. The assertion that surface fires were frequent is refuted by the peer-reviewed study by Baker and Ehle (2001), which shows that the fire-history methods used by Brown and Sieg are biased and would lead to an incorrect conclusion that surface fires are frequent. It is likely that surface fires occurred at much longer intervals than reported by Brown and Sieg. The assertion that surface fires prevent crown fires is based on outdated scientific research that failed to recognize the significant role of drought and extreme fire weather in the occurrence of crown fires (Baker 2003).

Agency Response:

The statement that the Forest Service misrepresents the risk of fire on the Black Hills is an opinion that is not shared by the experts that worked on the DEIS and by most of the comments received on the DEIS. The Interdisciplinary Team has reviewed the current literature including Baker and Ehle. It is their opinion based upon research and personal expertise that the project area has a higher risk of catastrophic crown fires than in the past.

Letter No: 76 **Comment No:** 8 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

The simple occurrence of surface fires does not mean that the BHNH belongs in Condition Class 3, as there is no sound scientific basis, given the evidence presented in Baker and Ehle (2001) that the forest has actually missed significant numbers of surface fires. Moreover, crown fires are a natural part of the fire regime, and there is no scientific basis whatsoever for the assertion that they have become more frequent than they were in the past in the Black Hills. There are no data whatsoever with which this assertion can be tested.

Agency Response:

Based upon their literature review and own expertise, the Interdisciplinary Team has determined that the project area has departed from its natural fire frequency by one or more fire return intervals. It is their conclusion that the vegetation and fuel attributes have been altered and most of the area is within a Fire Regime I and is in a Condition Class 2 or 3. These regimes are characterized by a 0-35 year frequency with low to mixed severity fires where less than 75% of the dominant overstory vegetation was replaced. This does not mean that crown fire did not occur or that some fire intervals were over 35 years, but neither of these were the norm.

Letter No: 76 **Comment No:** 9 **Resource:** Veg

Biodiversity Conservation
Alliance

Comment:

The Forest also fails to miss an important distinction of Black Hills ponderosa pine. The natural density of these forests has been well documented to have been high relative to other ponderosa pine forests, such as those of the Southwest. The data in McAdams thesis, for example, show that the pre-EuroAmerican density of these forests was as much as 5 times as high as those of the Southwest. Shinneman and Baker (1997) also review evidence that these forests contained a high density of large, old trees before industrial logging began.[2] However, the DEIS does not address the findings of Shinneman and Baker and others that have found dense ponderosa pine forest to be natural and widespread occurrence in the Black Hills.

Agency Response:

The high density of ponderosa pine is the main contributing factor to crown fire hazard. Alternatives B and C are designed to reduce the amount of high density pine stands to reduce risk of catastrophic wildfire in the wildland/urban interface. Alternative A (No Action), retains or moves the project area towards a denser pine forest

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 10 **Resource:** Fire/Fuels

Biodiversity Conservation
Alliance

Comment:

The FS also fails to acknowledge increasing scientific and other evidence that crown fires in ponderosa pine forests in this region are strongly associated with severe drought and extreme fire weather, and under those conditions crown fires will likely be little affected by fuel conditions or stand structure (i.e., tree density). Evidence of this can be seen in recent fires, such as Jasper fire, which burned through highly managed and thinned forests, but more compelling scientific analysis comes from the recent scientific assessment of the Hayman fire in Colorado by the Rocky Mountain Research Station (http://www.fs.fed.us/rm/hayman_fire/)

Agency Response:

The Forest Service acknowledges that crown fires are associated with severe drought and extreme fire weather. However, it is the conclusion of the specialists on the Interdisciplinary Team that vegetation management including thinning and prescribed burning can be used to reduce the effects of large catastrophic fires and the potential for large stand replacement fires. This is supported by an assessment of the Hayman Fire, which showed that two restoration projects did have the effect of reducing fire behavior when compared to adjacent untreated stands. The summary report for the Rodeo-Chediski Fire states "that even under the most severe draught conditions on record, and given an event with extreme fire behavior, positive benefits can be attributed to forest management activities that reduce crown densities, raise canopy heights and diminish fuel loadings." The Cone Fire, Megram Fire, Cerro Grande and the Hi Meadows Fire are other examples where fuels management helped mitigated some effects that a wildfire had on the ecosystem. The Forest Service acknowledges that it is impossible to prevent forest fires including crown fires. However, vegetation management can reduce the chances of a crown fire occurring and can be used to mitigate some of the effects that they have on the ecosystem.

Letter No: 76 **Comment No:** 11 **Resource:** Wildlife

Biodiversity Conservation
Alliance

Comment:

The FS ignores the fact that fire is an integral part of the Black Hills ecosystem, providing innumerable ecological benefits. The DEIS fails to address the fact that stand replacing fires are beneficial to sensitive woodpeckers, like the black-backed, three-toed, and Lewis' woodpeckers (Mohren 2002, Saab and Vierling 2002).[3] The DEIS also fails to address the fact that fires can create openings in the forest, open up meadows, and create forage. The DEIS emphasizes perceived negative impacts associated with wildfires and fails to adequately present, analyze, and assess beneficial impacts.

Agency Response:

The Prairie DEIS acknowledges that "ecosystems in the Black Hills evolved in dynamic equilibrium with recurrent disturbances, especially fire, insects, and short- and long-term climatic cycles" (DEIS pg. 129, Wildlife Habitat, Affected Environment). Sensitive species, including woodpeckers that benefit from fire, are addressed in the Prairie BA/BE, located in the project file. The Prairie DEIS acknowledges that "a century of fire suppression has caused widespread alteration and degradation of wildlife habitat in the Black Hills" (DEIS pg. 129-130), and that "frequent recurring disturbances like fire and insects maintained a generally open, mature canopy with a productive and diverse understory by thinning pine stands and creating open stands with abundant grasses, shrubs and forbs in the understory" (DEIS pg. 130). Further, the Prairie DEIS acknowledges that as a result of fire suppression, "encroachment of pine into meadows has reduced grass, forb, and shrub availability (DEIS pg. 130).

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
76	12	Wildlife

Biodiversity Conservation
Alliance

Comment:

The FS proposed amendments to the BHNF 1997 Revised Forest Plan are significant in that they affect sensitive species whose forest-wide viability are uncertain, they affect the ability of the FS to manage the entire BHNF "for" old growth by allowing activities in Management Area Prescription 3.7 that inhibit the creation of old growth, and that cumulatively, they lead to forest-wide changes in wildlife habitat that were not considered in the original 1997 Forest Plan and EIS or the Phase I Amendment. A significant amendment to the BHNF Forest Plan requires the FS to follow the process at 36 CFR § 219.12.

Agency Response:

Significance of amendment(s) is evaluated per 36 CFR 219.10 and FSH 1909.12, disclosure is made in the ROD, and appropriate course of action followed.

Letter No:	Comment No:	Resource
76	13	Wildlife

Biodiversity Conservation
Alliance

Comment:

The DEIS fails to consider the cumulative impacts of past, present, and reasonably foreseeable nonsignificant, site specific forest plan amendments related to northern goshawk protection, big game habitat, and late successional management areas. The FS has amended and has proposed to amend the 1997 BHNF Forest Plan several times in the past year through site specific, project-level decisions. While many of these amendments relate to big game habitat protection throughout the B HNF, some relate to goshawk protection and late successional habitat protection throughout the BHNF. In the context of the proposed forest plan amendments, the cumulative impacts of past, present, and reasonably foreseeable forest plan amendments must be must be considered. Indeed, courts have held that the failure to consider the cumulative impacts of other forest plan

Agency Response:

The Black Hills NF has amended the 1997 Forest Plan Revision twice. The first time was the Phase I amendment in 2001. The only project level amendment has been regarding big game habitat in the recent Canyon/Nest Project on the Hell Canyon Ranger District, which is located some distance from the Prairie Project. Such an analysis is more appropriately done at the Forest Plan level. And in fact, analysis and disclosure regarding some of these issues at the Forest level is imminent with the pending completion of the Phase II Forest Plan Amendment

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
76	14	Wildlife

Biodiversity Conservation
Alliance

Comment:

The FS is jeopardizing the northern goshawk in the Black Hills, an imperiled forest raptor for which the FS admits it knows very little about in terms of its population and habitat status in the BHNF and for which the FS is uncertain whether a viable population currently exists in the Black Hills. The FS has failed to present information or analysis showing that this sensitive raptor and its habitat are viable on the BHNF or that its population and habitat are well distributed. The FS has not provided any population trend data that would provide a context for conclusions regarding impacts to this sensitive raptor, despite the fact that the goshawk is a management indicator species and the FS makes conclusions regarding the status of this species' population (i.e., makes a viability determination). The DEIS also fails to consider cumulative impacts to northern goshawk, including the cumulative impacts of nest vandalism and recent fires. The DEIS presents an entirely inadequate assessment of impacts to this sensitive bird and its habitat. We request the FS not amend the Forest Plan to allow timber harvest – commercial or noncommercial – in goshawk PFAs and other designated habitat to ensure and facilitate the creation of nesting habitat.

Agency Response:

Northern goshawk nesting activity is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). The northern goshawk is also monitored by the Rocky Mountain Bird Observatory (Panjabi 2002, 2003), although several more years of data will be required before conclusions regarding habitat use and population size or trend can be made. In addition, surveys for this species are conducted in areas with potentially suitable habitat, but where there is no known territory. Changes in management of goshawk habitat were adopted with the Phase I Amendment to the Forest Plan in 2001 (USDA Forest Service 2001). The goshawk is addressed in the Prairie DEIS (pgs. 144-149), and in the Prairie BA/BE (Project File). Species viability is beyond the scope of the Prairie Project EIS, as is the distribution of the population or habitat across the Forest. Cumulative effects to the goshawk are addressed in the Prairie BA/BE (Project File). Commentor's concern for no timber harvest in goshawk PFAs and other

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 15 **Resource:** Wildlife

Biodiversity Conservation
Alliance

Comment:

The FS is continuing to reduce the availability of dense mature and late successional forest, despite the fact that researchers have recommended the FS retain large tracts of such habitat to ensure the viability of sensitive woodpeckers and other species dependent upon such habitat (see e.g., Anderson and Crompton 2002). The FS also fails to provide population trend data for the brown creeper, a management indicator species that is representative of the health of late successional habitat and species dependent upon such habitat. Compounding the lack of population data is the absence of habitat trend data. There is no context for the agency's conclusion that this species' viability will not be jeopardized or that the viability of other species dependent upon similar habitats will not also be jeopardized. Finally, how is the FS assessing impacts to late successional habitat? We also find it hard to believe that fuel breaks are needed in areas where late successional forest exists? Wouldn't late successional areas act as natural fuel breaks given that they typically consist of large diameter trees, have a more mesic microclimate than other parts of the forest, and shade more of the forest floor? We request that no fuel breaks be constructed in late successional forest.

Agency Response:

Late successional forest is addressed in the Prairie DEIS (pgs.134-135, 171). The Forest Plan (USDA Forest Service 1997) designated large blocks and scattered patches of late successional habitat as Management Area 3.7 across the forest. The brown creeper is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). This species is also monitored by the Rocky Mountain Bird Observatory (Panjabi 2002, 2003). This monitoring program is designed to provide statistically rigorous, long-term population trend data on most diurnal, regularly breeding bird species in the Black Hills. However, since this monitoring program is only in its third year of data collection, it is too soon to assess whether population sizes are changing, and if so, whether trends are positive or negative. Since the brown creeper is not a Region 2 sensitive species, the Prairie DEIS makes no statements nor draws any conclusions regarding the viability of the brown creeper. Species viability is beyond the scope of the Prairie DEIS. There are two types of late succession ponderosa pine defined for the Black Hills (USDA Forest Service 1997). The open-canopy, savannah type late succession consists of clumps or groups of large, old trees with grasses between the clumps. Stands in this late succession type contain little down dead material and few small trees. The closed-canopy type late succession has multiple canopy layers made up of various aged trees, including large, old trees. Such stands are well stocked with trees and contain standing dead and down trees (Mehl 1992). The latter type of late succession would not act as a natural fuel break; to the contrary, such stands would contribute to crown fire risk due to the abundance of ladder fuels and a contiguous canopy. Commentor's preference that no fuel breaks be constructed in late successional forest is noted.

Letter No: 76 **Comment No:** 16 **Resource:** Wildlife

Biodiversity Conservation
Alliance

Comment:

Is there any white spruce in the timber sale area? If so, how will this habitat be protected, especially given its importance to several native species in the Black Hills (e.g., marten, flying squirrel, etc.)?

Agency Response:

There are no stands typed as white spruce in the Prairie Project Area (DEIS Figure 3-1 pg. 76, Table 3-10 pg. 130). There are a few small inclusions of white spruce scattered primarily along the steep, north-facing slopes of the Rapid Creek corridor. Nearly 50% of this segment of Rapid Creek flows through private property. The size and extent of these inclusions likely precludes their suitability as potential habitat for American marten, northern flying squirrel, etc. In addition, most such inclusions occur on very steep slopes that are inaccessible.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 17 **Resource:** Wildlife

Biodiversity Conservation
Alliance

Comment:

In terms of sensitive plants, we cannot determine whether high quality will be avoided or whether it will be treated. We request the FS better explain the impacts of the Prairie Project to sensitive plants and high quality habitat. If the FS is proposing to treat high quality habitat, how is the agency assessing this impact? We request all high quality habitat and all sensitive plants be fully protected.

Agency Response:

Region 2 sensitive plant species and the effects of project activities are addressed in the Prairie BA/BE (project file). Rare plant surveys of the Prairie Project Area were conducted in 2002, including intensive surveys of high quality habitat (results in project file). Only one sensitive species (*Arnica lonchophylla*) was located. This species has been found to be much more abundant and widespread on the Black Hills National Forest than originally believed, and has been found to colonize old road cuts, indicating an ability to reestablish after disturbance. The majority of high quality habitats where sensitive plants are most likely occur are riparian areas, seeps, springs, etc., which will either be avoided or protected through mitigation measures. Commentor's request that all high quality habitat and all sensitive plants be fully protected is noted.

Letter No: 76 **Comment No:** 18 **Resource:** Wildlife

Biodiversity Conservation
Alliance

Comment:

The FS fails to provide a scientifically defensible analysis and assessment of the impacts of fragmentation. The DEIS claims that fragmentation is an "eastern" problem, despite the fact that studies have found fragmentation to be a problem on the BHNH and that this problem may be jeopardizing some native species (see e.g., Shinneman and Baker 2000, Anderson and Crompton 2002).[4] Fragmentation has been found to adversely impact northern flying squirrel (Reunanen 2000), red-backed vole (Beauvais 1997), black bear (Mollohan 1989), and American marten (Buskirk 2002), all species that inhabit the Black Hills.[5]

Agency Response:

Reference is made to fragmentation discussion in the Revised Forest Plan FEIS (pgs. III-247 through III-275). Fragmentation is addressed on p. 169 of the Prairie DEIS, and as stated, the forests in the Black Hills are naturally fragmented by variation in topography, aspect, geology, and vegetation changes. Although known to have occurred as recently as 1968, there is no evidence that a wild breeding population of black bears exists on the Black Hills at this time (USDA Forest Service 2001), although an occasional bear escapes from Bear Country, a local tourist attraction that breeds, houses, and exhibits black bears (Higgins et al. 2000)

Letter No: 76 **Comment No:** 19 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

The FS is jeopardizing water quality in Rapid Creek below Pactola Dam, a stream that supports native fish species sensitive to the impacts of stream pollution and that used to support a thriving population of American dipper. There is no indication that a reduction in CDAs will actually occur or whether a simple reduction in CDAs will adequately protect water quality and reduce sedimentation. There is little to no context provided for the supposed "reduction" in CDAs – no monitoring data has been provided, no case studies from the Black Hills, no published literature, and no unpublished literature to support the effectiveness of such a measure in adequately protecting

Agency Response:

The Forest Service is protecting the water quality in Rapid Creek through the implementation of Forest Plans Standards and Guidelines, which includes the WCPs and BMPs. The definition of a CDA is an area that is contributing sediment to an intermittent or perennial stream. Eliminating a CDA will improve the stream and water quality and enhance the aquatic environment.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 20 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

The DEIS overlooks the fact that some CDAs may be causing more problems than others in the Prairie Project area, which is very disconcerting and renders the analysis very flawed. The CEQ NEPA regulations require that impacts be analyzed and assessed, 40 CFR § 1502.16, meaning the significance of the impacts of existing CDAs should have assessed and the significance of the impacts of existing CDAs be measured and compared with the significance of the impacts of the proposed CDA reductions and short-term increases in sedimentation. At the least, such a comparison could provide some support for the DEIS's conclusions. However, no such assessment is presented and/or referenced, making it impossible to find any weight in the conclusion that a simple reduction in CDAs will reduce the amount of sediment reaching Rapid Creek.

Agency Response:

CDA is an area that is contributing sediment to an intermittent or perennial stream. Yes some can contribute more than others, but they are all contributing sediment. It is the intent of the project to fix and repair all CDAs, which will improve the water quality of the area.

Letter No: 76 **Comment No:** 21 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

Additionally, we are hard pressed to determine from the DEIS whether CDAs will actually be reduced in the Prairie Project area as the FS claims. While the Prairie Project will obviously address certain CDAs, in the context of past, present, and reasonably foreseeable impacts there is no indication that there will be a net reduction in CDAs. Most glaring, is that the past, present, and reasonably foreseeable impacts of off-road vehicle use and the creation of unauthorized (i.e., illegal) routes seem to have been entirely ignored. Our concern is that because these routes are not engineered or planned by the FS or with consideration to water quality, they may have led to the creation of more CDAs since the area was last surveyed. Additionally, the future creation of unauthorized routes may lead to a net increase in CDAs even in light of the Prairie Project. It does not appear that these cumulative effects, as well as the cumulative effects of other past, present, and reasonably foreseeable road construction (temporary and permanent) were adequately considered. Overall, it would help if the FS could present information on the amount of CDAs that exist and then compare it with the amount of CDAs, with consideration of cumulative impacts, that will result from the Prairie Project. At the least, such information would add support to claims that an overall reduction in CDAs will occur. However, as discussed above, a simple reduction in CDAs is most likely not enough to ensure protection of water quality.

Agency Response:

The CDAs identified will be repaired and the Prairie Project will not create new ones as Forest Plans Standards and Guidelines, which include the WCPs and BMPs, will implemented. With the repair and elimination of the current CDAs, there will be an improvement in water quality. See Chapter 3 of the DEIS for disclosure of effects regarding CDAs.

Letter No: 76 **Comment No:** 22 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

The FS continues to assert that implementing BMPs will adequately protect water quality in the Prairie Project area. However, there still does not appear to be adequate support for relying upon BMPs as appropriate water quality mitigation measures. To begin with, the DEIS presents no information or analysis showing that South Dakota BMPs are effective in protecting water quality, aquatic ecosystems, and soils on the Black Hills. Although some monitoring has been done of BMP effectiveness in South Dakota, we cannot see how these monitoring results provide any meaningful insights. Indeed, there are many flaws in the monitoring that render the results

Agency Response:

BMPs will protect water quality. As outlined in the Final Watershed Specialist Report, BMP Effectiveness section, BMPs are effective, not just here in the Black Hills but in forests throughout the United States.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 23 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

Most egregiously, is that the BMP audit most recently done in the Black Hills of South Dakota doesn't even address water quality, or whether the beneficial uses of streams in the audit areas were actually protected. The audit also suffers from other major flaws, for instance: The report presents no cumulative effects discussion. For instance, the report does not discuss historic impacts to watersheds and fails to disclose the existing conditions of the watersheds that were monitored. Most glaringly, is that the report presents no water quality data whatsoever. It is therefore impossible to ascertain any context – temporal or spatial – for their conclusions, context which is necessary to conclude any level of effectiveness. The report does not cite or present any actual water quality monitoring data to suggest any relationship exists between BMP effectiveness and the protection of water quality. Without any reference to water quality standards and water quality data, there is no indication that any relationship exists between BMPs and the protection of water quality in the Black Hills. The report provides no temporal context for its conclusions. There is no indication that five years down the road the BMPs will lead to increased problems. There is no information provided on the long-term effectiveness of BMPs. Such information is crucial because the FS often concludes that BMPs will protect water quality in the long term. Yet, without any temporal context, there is no support for such an assertion. The report provides no spatial context for its conclusions. Instead, the report focuses on a few areas in the Black Hills and asserts that BMPs are overall effective, essentially ignoring the overall impact of BMPs to entire watersheds. There is no attempt to disclose the existing watershed conditions in any of the monitoring areas. The report does not disclose whether a stream is impaired, partially impaired, or experiencing periodic water quality problems. The report is entirely based on qualitative measurements, which are helpful, but without a quantitative context are meaningless and cannot provide accurate insights into the ability of mitigation measures to effectively protect water quality. Since water quality standards are quantitatively measured, it would seem logical that BMP effectiveness would also need to be quantified to ensure protection of water quality and Clean Water Act compliance. The report doesn't distinguish between "met" or "exceeded" BMP effectiveness, thus lumping these two categories into one and biasing the overall results and data. The report was prepared by the Black Hills Forest Resource Association, making it very difficult to take the results of the monitoring seriously. We find it hard to believe that a group dedicated to promoting logging can credibly measure the impacts of logging. It is to their interest to bias the results of monitoring in favor of logging and thus, there is no credibility to the report.

Agency Response:

The commentator's opinion on how the BMP audit done in South Dakota is noted.

Letter No: 76 **Comment No:** 24 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

Courts have struck down FS reliance upon BMPs to protect water quality when not considering key factors that influence their effectiveness. In *The Wilderness Society v. Bosworth*, the District of Montana ruled: Because BMPs have not been assessed for their effectiveness against landslide events and because of a high risk of landslides is acknowledged in the Fish Bate [timber sale] preferred alternative, the Court finds it is not reasonable for the Defendants to just summarily rely on BMPs to mitigate this environmental impact. Therefore, the Court finds the FEIS conclusion that the project will have no effect on water quality to be arbitrary and capricious based on the undisputed risk of landslides in the FEIS. Accordingly, the decision is reversed and remanded. *The Wilderness Society v. Bosworth* 118 F. Supp.2d 1082, 1107 (D. Mont. 2000). In this case, the FS failed to show that BMPs were effective in light of the potential for landslide events, an arbitrary and capricious act. Similar to this case, the FS has failed to show that BMPs will effectively water quality in Rapid Creek as a result of the

Agency Response:

BMPs will protect water quality. As outlined in the Final Watershed Specialist Report, BMP Effectiveness section, BMPs are effective, not just here in the Black Hills but in forests throughout the United States.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 25 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

Furthermore, even if BMPs and some types of road maintenance and improvement can provide some nominal reduction in the some types of damage caused by roads, they do not come close to reducing road impacts to ecologically insignificant levels. Several types of environmental havoc caused by roads cannot be reduced an iota by BMPs. For instance, the loss of large woody debris recruitment from roads in riparian areas and the interception of subsurface flows at road cuts cannot be ameliorated by BMPs. Ziemer and Lisle (1993) indicated that there are no reliable data indicating that BMPs are cumulatively effective in protecting aquatic resources.[6] Espinosa et al. (1997) provided evidence from case histories in granitic watersheds in Idaho that BMPs thoroughly failed to cumulatively protect salmonid habitats and streams from severe damage from roads and logging.[7] In analyses of case histories of stereotypical resource degradation by stereotypical land management (logging, grazing, mining, roads) several researchers have concluded that BMPs actually increase watershed and stream damage because they encourage heavy levels of resource extraction under the false premise that resources can be protected by BMPs (Stanford and Ward, 1993, Rhodes et al., 1994 Espinosa et al., 1997).[8] Stanford and Ward (1993) termed this phenomenon the "illusion of technique."

Agency Response:

The comments are noted. BMPs will adequately protect water quality. Comparing the soils and geology of the PPA to the granitic soils and geology of Idaho is not a valid comparison as the granitic soils are far more erosive than the soils of the PPA.

Letter No: 76 **Comment No:** 26 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

While the FS has failed to provide adequate information and analysis supporting the effectiveness of BMPs, there are strong indications that BMPs are, in fact, not effective in protecting water quality in the Black Hills. The American dipper (*Cinclus mexicanus*), an imperiled aquatic songbird that has been petitioned for listing under the Endangered Species Act as a threatened or endangered distinct population segment, has been greatly impacted by poor water quality in the Black Hills (Backlund 2001). Because of its specialized habitat needs and sensitivity to pollution (especially caused by excessive sediment), the dipper has also been recognized as an indicator of water quality and watershed health (Tyler and Ormerod 1994, Osborn 1999, Sorace et al. 2002, Feck 2002).[9] Therefore, the fact that the dipper is imperiled in the Black Hills signals that water quality is suffering, despite the use of BMPs. While the FS may claim that other factors besides silviculture activities may be contributing to the dipper's imperilment, this only calls attention to the need to fully consider cumulative impacts to water quality and also exposes key flaws in the BMPs relied upon to protect water quality. Indeed, unless BMPs are designed to address the cumulative impacts to water quality, then they cannot effectively protect water quality as the FS is claiming. At the least, serious questions exist over whether BMPs effectively protect water quality in the Black Hills and the Prairie Project area.

Agency Response:

BMPs will protect water quality. As outlined in the Final Watershed Specialist Report, BMP Effectiveness section, BMPs are effective, not just here in the Black Hills but in forests throughout the United States. In relation to the American Dipper, if water quality is the only or main factor for their peril, they should be thriving downstream from Pactola Reservoir. Rapid Creek, below Pactola Reservoir is a sediment starved stream, because the reservoir traps sediment and does not allow it to continue through the system. There are four and half miles of Rapid Creek below Pactola before the first major tributary, Deer Creek. Sediment or water quality is not the only factor affecting the Dipper and to imply that the BMPs are not working and are affecting the Dipper is the commentor's

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 27 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

The FS fails to adequately analyze and assess the impacts of pond dredging. The FS states that dredging the ponds at Victoria Dam and Prairie Dam will produce a "short-term effect," but that, "This sediment would be flushed through the system and have no long-term effects" (DEIS, p. 55). Where is the support for this claim? In a study of American dippers in the Front Range of Colorado, it was found that reservoir maintenance severely impacted dippers and their habitat (Price and Bock 1983).[10] As it is, there is no indication that the sediment will simply be "flushed through the system." How will this sediment affect pools depth, riffles, and aquatic macroinvertebrates, which are the primary prey for American dipper?

Agency Response:

The sediment that will be generated from dredging the dams will be the wash load or fine sediment. All other material will be removed and placed on an upland site and not in the creeks. This sediment will be carried through the system during high flows. Prairie Creek and Victoria Creek are not prime habitat for the Dipper. They generally prefer streams greater than two meters wide (Haas, 2003). Preferred Dipper habitat is in Rapid Creek which is six stream miles downstream for Prairie Creek and five stream miles downstream for Victoria Creek.

Letter No: 76 **Comment No:** 28 **Resource:** Hydro

Biodiversity Conservation
Alliance

Comment:

The FS's overall treatment of the impacts of the Prairie Project to water quality seems to miss the point entirely. The agency seems driven to simply "reduce" water quality impacts, when in fact the agency has a duty to protect water quality from adverse impacts. The Clean Water Act requires the FS to comply with all State and Federal water quality laws. 33 USC § 1323(a)(2). Further, the State of South Dakota provides specific direction to State of South Dakota Water Quality Rule 74:51:01:34(5). This rule states as follows: "Antidegradation of waters of the state. The antidegradation policy for this state is as follows: (5) No further reduction of water quality may be allowed for surface waters of the state that do not meet the water quality levels assigned to their beneficial uses as a result of natural causes or conditions, and all new discharges must meet applicable water quality standards[.]". This authority of this rule is further strengthened by the requirements of the Clean Water Act regulations. The antidegradation policy found at 40 CFR § 131.12(a)(1) states: The State shall develop and adopt a statewide antidegradation policy and identify the methods for implementing such a policy pursuant to this subpart. The antidegradation policy and implementation method shall, at a minimum, be consistent with the following: (1) Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." The statutory requirements of the National Forest Management Act also demand water quality protection, requiring that the FS: [I]nsure that timber will be harvested from National Forest System lands only where...protection is provided for streams, streambanks, shore-lines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat[.] 16 USC § 1604(g)(3)(E)(iii). Additionally, the National Forest Management Act implementing regulations require that Forest planning shall provide for...compliance with requirements of the CleanWater Act, the Safe Drinking Water Act, and all substantive and procedural requirements of Federal, State, and local government. 36CFR § 219.23(d).

Agency Response:

Water quality will be protected through the implementation of BMPs. Water quality will be improved by the reduction of CDAs. The Prairie Project will be in compliance with the Clean Water Act and the State of South Dakota Water Quality Rule.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 29 **Resource:** Hydro

Biodiversity Conservation Alliance

Comment:

In this case, it is not evident that the FS is actually taking measures to ensure water quality is protected in the Prairie Project area. While periodic water quality problems have been identified and attributed to, among other things, roads and domestic livestock grazing, and there are admittedly numerous cumulative impacts identified, there is no indication that the Prairie Project will lead to the elimination of these and other potential water quality problems. Instead, the FS seems content to simply “reduce” water quality impacts, although it is questionable whether the project will actually reduce impacts. Such an approach is akin to using pain killers to treat cancer. While they relieve the pain and create an image of health, they do not treat the actual problem and do not help the

Agency Response:

BMPs will protect water quality. CDAs have been identified and will be repaired, which will improve the water quality and reduce cumulative impacts.

Letter No: 76 **Comment No:** 30 **Resource:** Hydro

Biodiversity Conservation Alliance

Comment:

Overall, the FS has not shown that water quality will be protected as a result of the Prairie Project. The FS has failed to show that the beneficial uses of Rapid Creek will be maintained and/or improved, or that water quality will not be further degraded. Further, the FS has failed to show that Rapid Creek will be adequately protected from deposits of sediment. Indeed, there is no discussion of sediment deposition and the potentially significant impacts of sediment deposition in the DEIS. And finally, the FS has failed to demonstrate compliance with the Clean Water Act and state water quality rules. At the least, this failure to ensure compliance with the substantive requirements of Federal and State laws strongly indicates that an environmental impact statement is needed to adequately analyze and assess the potentially significant impacts of the Prairie Project.

Agency Response:

BMPs will protect water quality. Since the water quality is being protected, the beneficial uses are also being protected and the Prairie Project will be in compliance with the Clean Water Act and the State of South Dakota Water Quality Rule. NEPA documentation for the Prairie Project is an EIS.

Letter No: 76 **Comment No:** 31 **Resource:** Hydro

Biodiversity Conservation Alliance

Comment:

Overall, there does not seem to be any support for the FS’s claim that, “Over the long-term there will be a decrease to the cumulative impacts from sediment because of the watershed projects.” Given the flaws discussed above, we cannot understand how the agency could have possibly reached this conclusion. We request the agency provide further information and analysis to support this claim and implement measures that are known to be effective in protecting water quality.

Agency Response:

Watershed projects can be CDAs, areas that are contributing sediment to the streams. Eliminating CDAs will reduce the cumulative impacts within the watershed, by reducing sediment to the streams. Watershed projects can also be areas that are causing erosion or problems associated with streams. This erosion sometimes makes it to the streams. Completing the watershed projects will improve conditions within the watersheds.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
76	32	Wildlife

Biodiversity Conservation
Alliance

Comment:

Because of the failure to adequately consider water quality impacts, the FS is jeopardizing the ability of Rapid Creek to support populations of American dipper. Furthermore, the FS's analysis and assessment of impacts to American dipper are cursory and inadequate. There is no consideration of the cumulative impacts of erratic water flows from Pactola dam, of past, present, and reasonably foreseeable water quality problems, and no consideration of the fact that Rapid Creek once supported a thriving population of dipper. There is no indication that the FS is providing for the viability of this species. Indeed, the FS has failed to even demonstrate that this species and its habitat is currently viable on the BHNH, making it likely that the agency has failed to meet its obligations to maintain the viability of native species. 36 CFR § 219.19. We request the FS review our petition to list the American dipper under the Endangered Species Act to better understand, analyze, and assess the potentially significant impacts to the dipper and ensure the bird and its habitat are adequately protected

Agency Response:

As referenced in the discussion of effects on the American dipper and its habitat (pgs. 155-156), direct, indirect, and cumulative effects to the physical, chemical, and biological components of aquatic ecosystems are discussed in detail on pgs. 50-61. Included in this section is lengthy discussion of the effects of the alternatives on sediment, bed and bank stability, flow regimes, temperature and oxygen, water purity, and aquatic life. When comparing flow data collected before the dam was constructed to flow data post-construction, it appears flows are more uniform after the dam was constructed than they were before dam construction. Flow data is from the U.S. Geological Survey monitoring station on Rapid Creek below Pactola Dam (site number USGS06411500, site name "Rapid Creek below Pactola Dam"), and can be found at <http://waterdata.usgs.gov/nwis>. Species viability is beyond the scope of the Prairie DEIS. Commentor's request to review petition to list the dipper is noted. See also

Letter No:	Comment No:	Resource
76	33	Wildlife

Biodiversity Conservation
Alliance

Comment:

Also, because of the failure to adequately analyze and assess water quality impacts, the DEIS's discussion of impacts to aquatic management indicator species is flawed. Adding to this is that no population trend data for aquatic MIS is provided and thus, there is no context for the impacts of the Prairie Project to aquatic species and

Agency Response:

In addition to and as referenced in the discussion of aquatic MIS species on pgs. 151-154, direct, indirect, and cumulative effects to the physical, chemical, and biological components of aquatic ecosystems are discussed in detail on pgs. 50-61. Included in this section is lengthy discussion of the effects of the alternatives on sediment, bed and bank stability, flow regimes, temperature and oxygen, water purity, and aquatic life. As stated on pg. 151 (brook trout), pg. 152 (brown trout), and pg. 152 (mountain sucker), of the Prairie DEIS, populations of these species are monitored Forest-wide by South Dakota Game, Fish and Parks, the results of which are found in the annual Forest Monitoring Reports. Additional discussion of instream fisheries habitat as related to aquatic MIS, and the effects of the alternatives has been included in the Errata section of the Prairie FEIS. The Prairie Project File also contains further information.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 76 **Comment No:** 34 **Resource**
Plan

Biodiversity Conservation
Alliance

Comment:

Biodiversity Conservation Alliance is not opposed to timber harvesting, thinning, or other economic activities occurring in the BHNH. We are simply advocating for the protection, and in some cases restoration, of native species in the forest and their habitats. We advocate for native species and their habitats not only because of their obvious economic values, but because of their worth as living beings and their inherent value as components of the Black Hills ecosystem. That the Black Hills are a unique and incredibly diverse forest is not in question. However, we do not feel that the diversity of life that exists in the BHNH has been given the attention and protection necessary to ensure it continues to exist and thrive

Agency Response:

Comments noted.

Letter No: 76 **Comment No:** 35 **Resource**
Plan

Biodiversity Conservation
Alliance

Comment:

The Prairie Project seems only to perpetuate the myth that the natural values of the Black Hills need to be sacrificed in the name of fire protection. Yet, it does not have to be this way. I know it, other people know it, you know it, and other people in the FS know it. The Black Hills are too valuable to be treated carelessly and too valuable for the Prairie Project to proceed as proposed. Again, while we appreciate the development of Alternative B, more could be done to address the potentially significant environmental impacts of the project and to address the threat of wildfire to property, homes and other structures, recreation areas, and human lives.

Agency Response:

Comments noted.

Letter No: 77 **Comment No:** 1 **Resource**
Plan

South Dakota Department of
Game, Fish and Parks

Comment:

SD Department of Game, Fish and Parks (SDGFP) has greatly appreciated the time you and your staff members have provided to us regarding our concerns on this particular project. Conversely, we enjoyed working with your staff on providing as much information and input as possible.

Agency Response:

Thank you for participating in the Prairie Project planning effort.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 2 **Resource**
Plan

South Dakota Department of
Game, Fish and Parks

Comment:

SDGFP has been reviewing FS proposed vegetation and timber sale projects for over 30 years. FS policies, national regulations, scientific knowledge and politics certainly all play parts in forest management and the input our agency provides. Generally speaking, we have witnessed an overall philosophy to favor heavy pine reproduction and fire suppression on BHNH at the expense of other resource concerns. For example, page 75 reveals that of the 22 timber sales in pas 20 years, on 34,000 acres, Mystic conducted non-commercial thinning on only 11,723 acres (or 30%), for an appallingly low average of only 586.15 acres/year. Unfortunately, it is not suprising that this District and the majority of the Forest are experiencing very disturbing situations with biodiversity concerns, water quality issues, lack of effective travel management, fuel buildups and large-scale fires that occur outside known historic patterns. Yet, over and over, SDGFP review forest vegetation management projects that continue to keep this forest in its current state (Elk, Bugs and Fuels DEIS is a recent disappointment to us) because, quite frankly, forest leadership has not taken one project in another direction with significant forest amendments.

Agency Response:

Your comments are noted.

Letter No: 77 **Comment No:** 3 **Resource**
Plan

South Dakota Department of
Game, Fish and Parks

Comment:

We therefore, reviewed this DEIS with cautious optimism that maybe this project could be different than Forest Plan "business as usual" in terms of pine treatments. Most of the numerous tables, figures and honest, blunt discussions were refreshing, even if we didn't always agree with the information. We greatly appreciated the effort made to make this information available to the reader. While it would take too long to list each and every thing we appreciated for information or disagreed with, we do have file notes that we can submit for your own purposes upon request. We are pleased to inform the FS that we applaud you and your staff for offering "something different" to the public in Alternatives B and C. We do not and cannot support any one Alternative in its entirety; we preferred to review alternatives that offered actions well outside Forest Plan direction. We thank you and your staff for the enormous effort and publicity you have provided to date. Therefore, following are SDGFP comments pertaining to primarily Alternatives B and C. We do not support Alt. Neither A nor Alt. D.

Agency Response:

Comments noted. The Prairie EIS discloses the effects of various vegetation treatments to reduce the fuels and fire hazard in the project area. These effects are based on analysis, scientific literature and first hand observation and experience. Cooperative efforts with the South Dakota State Divisions of Wildland Fire and Forestry as well as local city and volunteer fire departments will receive increased emphasis under all action alternatives. The objective is to work with and encourage private landowners/residents to reduce fuel hazards on and near their property. It should be obvious to most readers of the DEIS that the agency repeatedly (in tables and text) has disclosed that commercial timber volume is generated from vegetative treatment at varying levels depending on

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 4 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Page iii- States Alt C plans to remove "small and large trees...in order to break up the continuity and reduce the unnaturally high concentration of biomass in the Forest." Define unnaturally vs. naturally. It would be helpful to the reader if the FS had some sort of measurement to gauge the desired future condition of this project area. Define biomass - basal area may be one measure of biomass but how that biomass is manifested varies on a structural stage basis such as when comparing equal BA's between dog-har and old growth.

Agency Response:

Unnatural high biomass – Statement is based upon early photographs of the Black Hills. Inventories that show a significant increase in the amount of vegetation and timber over time and loss of openings and increases in diameter classes (pages 3-4 of the DEIS). For estimating crown fire potential, it is the increase in aerial fuels that are important, especially the needles and stem material less than 1" in diameter. This study used crown bulk density, trees/acre, basal area, average spacing between crowns, pounds of crown fuel/acre, and minimum crown heights when evaluating crown fire potential.

Letter No: 77 **Comment No:** 5 **Resource:** Plan

South Dakota Department of
Game, Fish and Parks

Comment:

Page 8- Forest Plan objectives, Goal 2. We believe FS could better incorporate objectives 205-209 in various degrees since goals tend to be rather lofty and vague. For example, we suggest that objective 208 could be met by managing for late successional inclusions. While vegetation diversity doesn't appear to be a major objective in a fire and fuels project, we argue that vegetation diversity is directly related to fire and fuels.

Agency Response:

Certain objectives for Goal 2 were listed in the DEIS because they were considered key to development of the purpose and need and the proposed action. We agree that other Forest Plan Objectives such as 205 through 209 can also be met to varying degrees via alternative implementation. Reference discussion in paragraph 2 on page

Letter No: 77 **Comment No:** 6 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Page 8-How will obj. 210 - fire simulation cut, be met?

Agency Response:

Currently there are no specifications or prescriptions for a "fire simulation cut". The Forest Plan directs the Forest Service to consult with the Rocky Mountain Experiment Station for the project design and monitoring. A "fire simulation cut" was not proposed in the Prairie EIS.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 7 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Bur Oak: No specific page reference but what are the responses of bur oak to mechanical damage and root disturbances? We know fire stimulates sprouting. We request that the effects analysis better discuss possible impacts (pro and con) to bur oak from mechanical damage, soil compaction, browsing of sprouts by domestic and wild herbivores. SDGFP also requests that mature hardwoods not be disturbed when possible in all vegetation and road treatments, with the exception of planned treatments to mature aspen.

Agency Response:

Bur oak sprouts vigorously after fire and other disturbance, including mechanical disturbance. Its sprouts prolifically from the root crown when the main stem is damaged. There are no treatments planned to stimulate oak regeneration. Mitigation for bur oak has been added to Design Criteria and Mitigation Measures (Prairie DEIS

Letter No: 77 **Comment No:** 8 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 12, 26- Core-use corridors are a nice way to say "sacrifice areas" for motorized on-and off-road uses.

Agency Response:

Core-use corridors are defined on page 13 of the DEIS. The definition states these areas are characterized mainly by their dispersed recreation and travel use opportunities - namely whether they are available for motorized use, non-motorized use or a combination of these uses. The core areas were developed to provide users with direct access to similar areas outside the project area.

Letter No: 77 **Comment No:** 9 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 18- DEIS mentions the urgency to act quickly. What is time table? What is the FS required timeliness on contracts? Can contracts be allowed to be extended with the result of not achieving the fuels objectives in a reasonable timeframe? And, is the FS fully forthcoming with public on how long this will take to accomplish including contract delays, contract extensions? Does the public know this project in its entirety will take at least 10 years and that the FS is not "fire-proofing" their property and homes?

Agency Response:

There are many projects planned within the Prairie area. Once a decision has been made some of the projects can be implemented immediately such as prescribed burning in areas not treated mechanically, storm damage treatments, travel management, and non-commercial fuel breaks. Commercial treatments through timber sales will occur over a longer time frame. Priority areas closer to developed property will be treated early in the process, probably within the next 3 years while other treatments and lower priority areas will be treated within 3 to

Letter No: 77 **Comment No:** 10 **Resource:** Plan

South Dakota Department of
Game, Fish and Parks

Comment:

Page 27- Alt. C mentions "roads", are they temporary or permanent?

Agency Response:

Road miles listed on page 27 of the DEIS refer to permanent roads.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 11 **Resource:** Hydro

South Dakota Department of
Game, Fish and Parks

Comment:

Page 31- 46 Watershed projects that 'eliminate 26 Connected disturbed areas:. Please better explain the definition of CDA's and implications of NOT repairing them for reasonable foreseeable impacts

Agency Response:

CDAs are defined on page 50 of the DEIS. They are areas such as roads and disturbed soil near streams that deliver sediment to the streams during runoff events. Not repairing them will mean that the sediment will continue to be delivered to the stream, which can harm insect populations and fish habitat.

Letter No: 77 **Comment No:** 12 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 31- Crouch Line Railroad Trail System "needs support, in part, from GFP". Division of Wildlife did not have the opportunity to contact the Division of Parks and Recreation. Did the FS contact Division of Parks and Recreation re: Crouch Line RR? Our office will be happy to pass this information along but a response will be well beyond the deadline for the DEIS comments.

Agency Response:

The Crouch Line Railroad Trail System is a proposed future trail system that will require many supporters with a variety of funding to accomplish. By placing our trail proposal within the Prairie Project proposal it was hoped that those interested in the trail would respond. If an alternative is selected that still proposes the trail, then the project will be forwarded to the State of South Dakota Department of Parks and Recreation for their response and

Letter No: 77 **Comment No:** 13 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Page 36- DEIS states "ponderosa pine savannahs created by seed cuts would provide natural safety zones" Please explain how a seed cut, used to promote rapid regeneration of pine, will create a savannah ecosystem. Savannah is an ecological condition. Did you mean that a seed cut would create a very temporary (<10 years) thinning with less crown density?

Agency Response:

Primary fuels in seed cuts are grasses with flashy fuels that have a fairly quick burnout time and the overstory is not dense enough to support a crown fire. This allows areas to be burned out and the black would be an effective safety zone. Retardant is also more effective in the more open forest when compared to a dense forest. Seedcut refers to the spacing between trees (usually a basal area less than 40) and not necessarily to the density of regeneration. The amount of regeneration in a stand can be reduced with prescribed burning or thinning.

Letter No: 77 **Comment No:** 14 **Resource:** Hydro

South Dakota Department of
Game, Fish and Parks

Comment:

Watersheds: Page 50, 60 - statement re: Rapid Creek. Where exactly is the location of the culvert to be lowered?

Agency Response:

The culvert is on Deer Creek at one of the Highway 44 crossings. What is planned for the culvert in not to reset it, as this would be cost prohibitive, but to raise the water level below the culvert to allow aquatic organism easier passage. One possible way of raising the water level is with a vortex rock weir below the culvert.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 15 **Resource:** Hydro

South Dakota Department of
Game, Fish and Parks

Comment:

Page 54 - Alt C and watersheds. 85% of commercial units within WIZ of hardwoods and meadows! GREAT!!!!!!
But, why conducting seed cuts which only promote pine regeneration? RX burning is planned on only 98 acres of
4,200 acres within the WIZ. Couldn't the FS do better than 2.3%???? Please expand and provide more RX burning

Agency Response:

Eight-four percent of the units within the WIZ are hardwood or meadow restoration. Some of the other units are
seed cuts because these stands are pine stands. Not all areas in the WIZ are meadows or hardwoods, there are
pine stands also. We do not necessarily want to convert all the WIZ's from pine as the pine stands can provide
shade for the streams and we want to maintain those stands. For prescribed fire, the 4,200 acres identified are
areas that have a reasonable chance of maintaining control. Increasing the amount of acres of prescribed fire will
increase the risk of maintaining control during a prescribed burn. Alternative B provides for increased prescribed

Letter No: 77 **Comment No:** 16 **Resource:** Hydro

South Dakota Department of
Game, Fish and Parks

Comment:

Page 50-"Roads are #1 watershed concern". Page 64 - soils. 6,176 acres of 8,800 treated acres (70.18%) are on
the "high or very high erosion hazard rating" and "greater opportunity to affect soils considered highly compactive.
SDGFP will continue to reference these statements re: travel management for Alt C since we do not believe Alt. C
is justified or can mitigate for damages.

Agency Response:

The comment is noted.

Letter No: 77 **Comment No:** 17 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Also, if closures have been largely ineffective, how can they become effective because there are instances where
the FS "assumes" effective enforcement of closures and use (like on page 53) then contradictory information will
state that the FS "assumes" law enforcement is ineffective in the analysis. While law enforcement is its own
division or section of the FS, it appears that is highly ineffective in both actual citations and mere presence alone.
What are other options open to the District such as deputizing FS employees, asking the public to adopt areas to
police and turn in information on violators, conducting environmental education programs to inform the public,
providing drop boxes for violator information throughout key areas in the forest and last but not least, provide a
decent map outlining all the restrictions and closure orders so the public is well informed of where it can and cannot

Agency Response:

It is clear that a comprehensive management plan will be needed to ensure effective closures. All of the items
you have proposed should be included in such a management plan.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 18 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 70+ and elsewhere re: Travel Mgt: SDGFP appreciated the maps, tables and information on miles of roads by various types and road densities. We also appreciated the blunt and truthful statements about impacts to resources due to roads and various on-road and off-road uses. We also agree that travel management is a monumental task, especially this close to an urban setting. We believe the travel management information offered in this DEIS was invaluable in our review of travel management and impacts on natural resources. However, we found the travel management discussion in on pages 70-74 difficult to follow and disjointed. Discussion of potential impacts to resources in Chapter 3, pages 163-167 was quite thorough. But, the lengthy discussion in pages 173-195 did not concisely tie-in previous information from pages 7-74 or 163-167. SDGFP constantly flipped among various sections of the Draft EIS to tie all the information together. For example, page 168 mentions Alt. C non-compliance with some forest standards for MA 3.7, but later discussion (such as page 187) did not even mention non-compliance. It is still unclear to GFP what is the final disposition of temporary roads and trails (Table 3-1). Why the FS is constructing existing unclassified roads to minimum standards (page 71)? We do not understand Table 3-4 vs. Table 3-3.

Agency Response:

Thank you for your comments regarding the travel management information contained within the DEIS. We agree that travel management is a "monumental task", especially this close to an urban setting. Readers may have to flip back and forth between sections within a DEIS to tie all the information together. By necessity, a DEIS is divided into sections where specific resources or aspects of the Project alternatives are discussed. For example, different information is presented in the wildlife section versus the recreation section; it would be too lengthy and unwieldy to repeat information in both sections. Page 71 of the DEIS states that "Temporary roads may also be needed to access portions of proposed units and would be obliterated after activities". Page 73 of the DEIS also states that any temporary road construction would be decommissioned (obliterated or made impassible). We understand your confusion about the term "construction" of existing unclassified roads. The term "construction" is used by our engineering department to designate the conversion of existing unclassified roads to Forest System Roads. A more appropriate way to state what actually would occur on the ground is to say "these roads would be reconstructed or maintained to minimum standards necessary for haul and protection of soil and water resources". As stated on Page 73 of the DEIS, all action alternatives would convert some existing unclassified roads to Forest System Roads. The majority of unclassified roads would be obliterated or converted to non-motorized use under all action alternatives.

Letter No: 77 **Comment No:** 19 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Road Economics: Between Tables 3-1 and 3-3, it appears that Alt. C is the most costly to maintain to Alternative standards and the least expensive for reducing road densities. We cannot support an alternative that increase maintenance standards, converts unclassified roads to classified while closing the least amount of roads. The FS has failed to justify economically and environmentally how it will mitigate for expenses and damages in Alt. C when FS analysis repeatedly admits the soils (compaction, Erosion), water quality (sedimentation) and off-road and on-road impacts are the biggest concerns in the Project Area. If that is so, it seems backwards and counter-productive to support Alt.C.

Agency Response:

Maintenance of roads is important to protecting the roadbed and surrounding environment. Increased maintenance is often associated with improved drainage to prevent sediment transport, erosion and associated water quality effects. The majority of unclassified roads would be removed or converted to non-motorized use under all action alternatives (See Table 3-3 on Page 72 of DEIS). As indicated in many places within Chapter 3 of the DEIS, travel management and road direction for Alternative C clearly would improve resource conditions over the existing situation. SDGF&P's support for closing more roads and off-road areas, and opposition to Alternative C is

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 20 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Mitigations: Page 186 and elsewhere re: Travel Management, Motorized expansion. Provide supportive documentation where tightening off-road restrictions has caused expansion elsewhere on this Forest, i.e.: cause and effect. This forest has allowed ORV in the majority of the forest since time began. Off-Roading is a cultural mindset, an expanding market and a largely unregulated Forest use due to very few Forest Restrictions. We request that analysis provide supportive evidence that choosing an alternative that further restricts off-road use (such as Alt. B) will cause expansion elsewhere in the Forest. To the contrary, we believe, based on the past 30 years of file correspondence between FS and GFP, low FS priority to protect resources from off-road impacts, lack of law enforcement and very little effort to date (with the exception of this Prairie Project) to take on this issue, expansion will simply continue to happen. It is its own beast. A few season restrictions or allocation core-use areas has yet to prove it can and will make a significant impact on travel management.

Agency Response:

We believe that the statement on page 186 is correct, that limiting off-road use within the Project Area would push this use into other areas of the Forest. Unless actual use is reduced on the Forest, then the use must go elsewhere. Exactly where, and whether this becomes a problem, is not known at this time. This belief is based on anecdotal information, as no formal studies on this subject have been conducted. For example, we have observed new "party spots" or off-road use areas being created once effective patrols or closures were

Letter No: 77 **Comment No:** 21 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

We applaud the efforts of the FS and various organized motorized-vehicle groups to work together on these issues. We realize that organized user groups can help regulate themselves and can be a great advocate for proper resource management and mitigation. However, off-road use is a cultural mind-set in the Black Hills and it is reasonable to expect that many non-members will not follow FS regulations. With such a minor law enforcement presence on this Forest, we question how greater motorized use in the project area will resolve the motorized vehicle issue elsewhere on the Forest. Please demonstrate where unrestricted use has created a "sponge" to relieve damage elsewhere on the forest.

Agency Response:

It is not possible to demonstrate where unrestricted use has created a "sponge" to relieve damage elsewhere on the Forest. The majority of the Forest is unrestricted to motorized use. No motorized use areas or "off-road" trails have been specifically developed on the Forest. Numerous contacts over the years indicates that many users would enjoy a developed or designated trail system for off-road motorized use if it was clearly marked and

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 22 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

How is Alt. C more of a balance between motorized and non-motorized recreation in combination with ADDITIONAL opportunities to pursue recreation (page 1986)? The area is already highly roaded, FS admits that enforcement is assumed ineffective in the analysis. How is allowing greater off-road and seasonal motorized use more of a balance when Alt. C. has the HIGHEST road density of all action alternatives? Also, that statement that this alternative provides opportunities for partnering is questionable in its logic - alternatives or not, the FS always has opportunities to develop partnerships.

Agency Response:

As stated on page 186 of the DEIS, Alternative C is responsive to those users who want to see a balance between motorized and non-motorized recreation use, and additional opportunities to pursue their favorite recreational opportunities. This is an attempt to "balance" motorized and non-motorized use compared to the current situation. It attempts to balance the interests of non-motorized users by closing roads and areas to off-road motorized use and proposing partnerships with non-motorized users to develop trails, with the interests of motorized users by designating specific areas for motorized use and proposing to partner with groups to develop motorized use areas or trails. Alternative C has a slightly higher overall road density than other action alternatives (233 miles for Alt. C versus 230 for Alternative D). Alternative C has a lower open road density in the summer-fall than Alternative D and a smaller percentage of the area open to off-road motorized use during the summer-fall, which includes the big game hunting season. We agree that opportunities to partner are always there; however, partnering opportunities to develop motorized and mountain bike trail systems have never been pursued. Alternative C affirmatively states the Forest Service desire to work with groups and individuals to establish and maintain such trail systems.

Letter No: 77 **Comment No:** 23 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 40 Alt. C South Zone - SDGFP does not and cannot support a 76-85% increase in unrestricted, off-road travel from May 15-December 15 in the far South Zone. These are critical times for wildlife with territorial establishments, seasonal movements, young-rearing, big game rutting and big game hunting seasons. While big game winter range may be protected from off-support Alt B has opposed to C for this classification. We are constantly bombarded with angry recreationalists that ask SDGFP to better regulate off-road motorized vehicles. They are quite frustrated when we inform them that we have no jurisdiction for travel management on Forest Service lands. In particular, we field many calls from hunters asking where they can hunt in an area closure or hunt where ATV's and pickups are restricted to certain road use only. Therefore, we support travel management option

Agency Response:

We are confused by the first part of this comment. Page 40 of the DEIS discusses Alternative D. The area referred to is Management Area 5.4, big game winter range emphasis. Alternative D proposes to restrict off-road motorized use during the winter-spring, per guidelines presented in the 1997 Forest Plan Revision. The change from the current 76% of the area open to off-road motorized use during the summer-fall to 85% under Alternative D reflects travel management changes for the entire area, not only the area on the south. We recognize that SDGF&P's receives phone calls from hunters upset about the amount of area open to off-road motorized use, and a desire to have more non-motorized hunting opportunities. It should be noted, however, that hunters are often split on the issue of road and off-road motorized access. Many hunters, either because of personal preference or physical limitations, prefer areas with substantial road and off-road motorized access. Both Alternatives B and C offer expanded non-motorized hunting opportunities. Your support for the Alternative B travel management

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 24 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 187. North zone: SDGFP does NOT support year round on and off-road motorized use for the entire area since East of Norris Peak Road and North of Hwy. 44 is currently classified as road and off-road motorized travel seasonally restricted AND MA 5.4 Big Game Winter Range Emphasis in the 1997 Forest Plan, being reclassified for year-round off-road use? Is it due to lack of law enforcement, topography and proximity to private lands? If so, be more forthcoming on why you are giving this area away from more resource protection to essentially none. Defend this by clearly outlining mitigations. This area is documented winter and year-round range for many species. By allowing unrestricted motorized use, wildlife will be constantly disturbed and displaced, it will seek refuge on private lands and will only cause more depredation to private lands. One of the FS goals in MA5.4 is to provide quality habitat on the Forest to reduce the time spent by wildlife on adjacent private lands. Alt. C does

Agency Response:

SDGF&P's objection to Alternative C's yearlong on and off-road motorized use within the area north of Highway 44 and east of the Norris Peak Road is noted. Action alternatives B and D have motorized restrictions for this area, either yearlong or seasonally. This specific area is heavily roaded. Currently, roads in this area are seasonally restricted (no winter-spring travel), but the area itself is open to off-road motorized vehicles yearlong. There is no closure order in place. This type of situation was discussed on Page 173 of the DEIS. Alternative C would manage this area as open to motorized use, although the majority of the Project Area would be restricted from motorized off-road use, as would a large amount of the roads. We agree that Alternative C does not meet the Forest Plan objective for Management Area 5.4 in this area—Alternative B is designed to follow Forest Plan

Letter No: 77 **Comment No:** 25 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Central Zone: Page 187 - does not mention taking a forest plan amendment for MA 3.7 but page 168 states that Alt. C is inconsistent with FS Standard 3.7-9103. Please better explain what is really happening in this central zone. SDGFP does not support unrestricted motorized access in MA3.7 and riparian areas but we do not fully understand your travel management plan in Alt. C.

Agency Response:

For Alternative C, the yearlong area off-road motorized closure boundary for the central zone does not follow management area boundaries. This is largely because it is impossible to identify these boundaries on the ground, which is an important element in establishing an understandable and enforceable travel management plan. Generally speaking, the boundaries in Alternative C follow roads so that they can be easily marked and understood by motorized and non-motorized users. The relatively small area of Management Area 3.7 that is affected does not experience significant motorized use because of topography and other factors. It is not currently restricted from motorized use and such use is not expected to affect the quality of habitat in this area.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 26 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 71: Why is the FS "maintaining" unclassified roads? If reconstructing some unclassified, why not close afterwards? What is the difference between "new road" construction and "temporary road" construction if all new roads will be closed? Isn't that also the definition of "temporary"?

Agency Response:

There are a large number of unclassified roads in the area. Some of these roads would be converted to system roads—those needed for long-term management of the Forest. Maintenance of these "converted" roads may occur. A "new road" is a newly constructed road that will remain after vegetative management activities are completed. A "temporary road" is constructed only for the purpose of conducting the vegetative management activities, and then obliterated. New roads (3 miles for Alternative C and 1 mile for Alternative D) would be closed either by a gate or other physical barrier. As stated on pages 188, 192 and 193 of the DEIS, new roads would remain on the landscape but would not be open to public use.

Letter No: 77 **Comment No:** 27 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Page 73 - Road closure order - when would it be prepared, signed and in effect? And, heard about a stalling of signing orders at the SO. How can we be assured the order will be signed?

Agency Response:

The Record of Decision will include the timing and extent of any closure orders to be issued. Closure orders should not be expected immediately following the decision. Time is needed to accomplish vegetative treatments, signing, development of maps, and overall public education.

Letter No: 77 **Comment No:** 28 **Resource:** Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

Confused by Table 3-2 through 3-4. Please better explain differences.

Agency Response:

Table 3-2 concerns roads that are either open yearlong or seasonally, and includes roads under National Forest jurisdiction and an additional 68 miles of roads under other jurisdictions. This includes U.S./State Highways, Pennington County and private roads. Table 3-3 includes roads that are closed to public motorized use yearlong, roads that are to be decommissioned (physically removed through a variety of means), and existing unclassified roads that would be converted to non-motorized trails. Table 3-3 includes only those roads and trails under Forest Service jurisdiction. Table 3-4 also includes roads under Forest Service jurisdiction. It shows only Forest System Roads, and includes any currently unclassified roads that would be converted to Forest System Roads under each of the action alternatives. There are multiple ways of accounting for the road system in this area, and these tables were intended to provide information in different ways in an attempt to provide adequate information to the

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 29 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Page 115: 223 miles is still too many miles in Alt. C. "Driving" to an area for fire suppression is not the only method - need to mention walking into areas and aerial assault.

Agency Response:

Fire suppression was only one of the factors used to determine the miles of road that would be left open year round or seasonally to the public. Input was obtained from ID Team members including wildlife and recreation specialists. However, roads do significantly affect our ability to fight fires. They significantly reduce our response time when compared to walking and the ability to get an engine to a fire will more than double line construction rates. Aerial resources such as helicopters and air tankers are good support but cannot be relied on because they are not always available and cannot fly in strong winds, adverse weather or at night.

Letter No: 77 **Comment No:** 30 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 76 - Veg cover types. Figure 3-1: Things like this are very valuable - thanks. 0.33% shrub covertype now? This is unacceptable!!

Agency Response:

Cover type is expressed as the predominant vegetation on a given site. Many sites that are of a pine type have a shrub understory that may be present but not predominant. In the alternatives where prescribed burning is planned there will be an increase in the understory shrub component of the stand but will still be classified as a

Letter No: 77 **Comment No:** 31 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 76-77: Not even 1/2 of pine are over 100 years old? This is unacceptable!!!! SDGFP cannot recommend cutting any big (>14" dbh) or old trees in the late successional stands with the exception of hardwood treatments. SDGFP recommends thinning from below and leaving the largest diameter classes of pine. While SS 4 includes >9" dbh, SDGFP conceded that smaller diameter trees are not generally providing the habitat necessary for late successional and old growth species. Therefore, fuel breaks, seed cuts, overstory removal, thinnings should be conducted with selective cuts and the philosophy of your Chief Bosworth, "it is not what we take but what we leave behind". Page 89: Fuel Breaks Alt. C. Commercial removal on 485 acres (vs. 366 commercial in Alt. B, difference of 199 acres). What percent of 485 acres is in MA 3.7? For all MA's, bring crown canopy down to what percent?

Agency Response:

Generally, larger trees will be retained in favor of thinning out smaller ones. Occasionally some larger pine will need to be removed in order to open up the pine stands to reduce crown fire hazard where the removal of only small dbh trees will not achieve the desired open spacing. Other treatments such as hardwood restoration and meadow restoration will also remove larger pine. Most treatments will favor leaving larger pine because the crowns of the larger pine are higher off the ground surface and have a lower probability of ignition from a ground fire.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 32 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 77: "The most common plant association in this area is ponderosa/snowberry.." This is crappy habitat association for most wildlife and evidenced quite clearly in the wildlife effects in Chapter 3. Snowberry is over-rated as a valuable, nutritional wildlife food and in more indicative of livestock over-grazing. SDGFP requests that the DEIS effects analysis better mitigate for lack of desirable shrub cover, reduction in snowberry and how various treatments will ensure a greater diversity of forbs and shrubs with Alt. C treatments. What monitoring will be conducted to measure the effectiveness of these treatments for increasing vegetation diversity?

Agency Response:

The ponderosa/snowberry association is common to the area and is used to determine the probability of success of natural regeneration treatments.

Letter No: 77 **Comment No:** 33 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 79: "An additional effect of these natural events has been a decrease in the scenic quality of the forest.. Life is messy, nature is messy. By constantly grooming the forest along our highways, we have taught the public that forests are manicured tree farms. So what if there is a mess - you need to state that the natural events also offer an opportunity to teach the public that natural events simply change the appearances of landscapes. You have put a value statement on natural events as "bad" while at the same time, SDGFP is told that "sacrifice areas" is a value statement. Two can play at this labeling game and it would be better to offer real opportunities to show all sides of nature. We assume FS fields many calls to "clean up the forest". Now is the opportunity for your environmental folks to slap up some signs, give public talks and stop teaching the public that forests are clean, groomed tree farms. A couple years ago, the CEAM team polled the public re: project area around McVey Burn. They found out that the local people think a forest looks like a managed roadside area.

Agency Response:

Your comments have been noted.

Letter No: 77 **Comment No:** 34 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 88, Alt. C: "Many of the stands in the project area have inclusions of less than 10 acres in size that may have basal areas, age classes, size classes and tree species that differ from the majority of the stand." This tells the reader that within-stand diversity is nearly lacking. Multiply that across all stands, and it appears there are large-area patches of mono-typic stands. Page 76, Figure 3-1 for Cover Types, Figure 3-2 for Age Class Distribution for Pine, further support that there is essentially little structural and plant species diversity in the PPA. While the emphasis of Alt. C is fuel reductions in the WUI, multiple benefits could be realized with most of the proposed vegetation treatments.....We applaud efforts to treat inclusions of any kind and support that the FS recognizes variations across the landscape.

Agency Response:

Your comments have been noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 35 **Resource:** Veg

South Dakota Department of Game, Fish and Parks

Comment:

Page 81:ROW - All Alternatives. Define "hazard tree". How far from the centerline? All roads or just paved highways? Is the FS proposing to remove "hazard" trees such as policy with SD DOT and Hell Canyon's Decision in the Jasper Fire Area? If so, SDGFP cannot agree to removal of swath of trees such as what was done in Jasper Fire Area on all classified and unclassified roads. Please better explain the intent of this project re:"hazard trees".

Agency Response:

"Hazard trees" to be removed from roadsides will generally include only those trees damaged or dead with an imminent potential of falling on the roadway. Most trees, including snags that lean away from roadways, will not be removed as hazard trees.

Letter No: 77 **Comment No:** 36 **Resource:** Veg

South Dakota Department of Game, Fish and Parks

Comment:

Page 89:Commercial Thinning Alt. C: CT=...and removing the "dominant" pine from the overstory unless needed for snag replacements. The remaining "co-dominant" pine will be left at an appropriate BA of 50." How are "dominant" and "co-dominant" defined in terms of SS and Age Class (also mentioned in Stand Structure of Alt. C, page 93, and elsewhere)? SDGFP prefers selective cuts of leaving the largest diameter class remaining. Please explain why or why not the FS could reduce to BA of 50 by leaving largest diameter pine as residual with variable

Agency Response:

Emphasis will be placed on retaining the dominant and larger pine in most of the treatments. Grouping and variable spacing will be used in most of the thinnings.

Letter No: 77 **Comment No:** 37 **Resource:** Veg

South Dakota Department of Game, Fish and Parks

Comment:

Page 89: Non-commercial thinning Alt C (effects like Alt. B, page 82). Variable spacing and leaving the largest pine (thus, removal of "thermal cover and screening"). Only thinning to FP conditions - SDGFP proposes that FS should analyze taking some areas below FP conditions in areas that are not adjacent to roads. SDGFP would like to keep as much screening cover as possible adjacent to gravel roads to provide escape cover.

Agency Response:

Leaving dense cover adjacent to roads reduces their effectiveness as control lines and increases the risk to firefighter safety as well as compromising evacuation routes for public safety. Roads many times are used as control lines from which firefighters "burn out" the fuels between the approaching fire and the road.

Letter No: 77 **Comment No:** 38 **Resource:** Veg

South Dakota Department of Game, Fish and Parks

Comment:

Table 2-1, page 44-45: Missing Sanitation cuts (12 ac), Shelterwood Seed Cuts (469 ac -C and 257 -D), Seed tree cuts (630 ac. -, 285 -D)

Agency Response:

Your observations have been noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 39 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 90: Shelterwood seed cuts on 469 ac (Alt C) and 257 ac (Alt D). Please explain to those readers not completely familiar with silvicultural terms why the FS wants to regenerate pine on these acres when it is currently a problem and the last sentence admits that this methods has high regeneration success? Please explain and better defend why the FS proposed to remove over-mature inclusions or stories when Figure3-2 indicates the Prairie Project Area (PPA) has very few trees over 100 years of age? This makes no sense to further reduce both structural stage and age structure. SDGFP does not understand the logic as presented.

Agency Response:

Regeneration harvests are planned to create large openings (stand size) in the canopy creating aerial fuel breaks that would impede an advancing crown fire. Regeneration harvests also creates a mosaic of stands with differing age classes and size classes. As regeneration increases in size and becomes a hazard, the pine will be non-commercially thinned and slash treated as in other non-commercial thinning areas to reduce the hazard on the

Letter No: 77 **Comment No:** 40 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 90: Seed Tree Cuts 630 ac. (Alt. C) and 285 (Alt. D) Provides for spotty regeneration for spacing and density variation - which is OK. But, why conduct this regen cut at all?

Agency Response:

See response for Letter 77 Comment 39.

Letter No: 77 **Comment No:** 41 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 90: Overstory removal - 602 (Alt. C) and 972 (Alt D). While trees may have reached CMAI and are no longer needed for timber reproduction purposed, Figure 3-2 illustrates the very small percentage of mature and over-mature trees in PPA. Removal of all "over-mature" (define this term) seems to be unnecessary in order to create more structural and age diversity in this PPA. Until livestock and wildlife began to consume pine, we don't believe that removal of the few big overstory trees will provide a significant release for establishment of forage for these beasts. SDGFP understood that the purpose of OSR is for timber reproduction or to reduce crown fire potential, not necessarily to provide a treatment for grass, forb, and shrub enhancement. This may be a by-product in limited applications, but we are not convinced of this benefit or else the PPA should not have 85% of the area in pine. Please provide supportive documentation. Why be concerned about "releasing" understory pine which are currently ladder fuels? Wouldn't it make more "WUI sense" to thin the understory pine, leaving the few, bit toothpick trees out there? Page 113 Alt C. states "The purpose of the commercial treatments proposed...would be to maximize tree growth and yield but to reduce the fire hazard". Therefore, where is the support that these few, widely spaced overstory trees will, in fact, create "aerial fuels"? You need to balance this statement by also revealing that the remaining understory trees will be a much heavier fuel load similar to what the FS states is out there. Map 5 indicates that at slightly more than half of the proposed overstory removals will occur in MA 5.4 and there is essentially no WUI in the proposed OSR area in MA 5.4. OSR is also either adjacent to meadow/pcc (?can't tell difference between blue and purple colors) and CT and TSI thins. Please better explain and defend why it is reasonable to retain those few bigger trees in a sea of "thinned" stands in MA 5.4 than to turn these acres into "same old stuff"

Agency Response:

See response for Letter 77 Comment 39.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 42 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Upon review of Stand 44 - Page 135, Table 3-16 says it will thin this stand commercially and non-commercially to alter the late successional character. Why create a "landscape scale" fuelbreak when this small patch is surrounded by SS3 and one unknown classified stands. Recommend thinning from below and more aggressively treat stands 26 and 27 to keep the integrity of stand 44 as Late Successional. Regarding "aerial" fuels, we suggest that the 3 B and C stands adjacent to private lands could be more of a connective, ladder, aerial fuel concern? Explain why this is or is not an option.

Agency Response:

Table 3-16 on pg. 135 of the Prairie DEIS contains a typographical error discovered since the DEIS was issued. Site 091803-44 was not designated by the Forest Plan as a scattered late successional stand; rather, site 091803-43 was designated by the Forest Plan as scattered late succession. Site 091803-43 is not treated in any action alternative. This error has been corrected in the Errata section of the Prairie FEIS.

Letter No: 77 **Comment No:** 43 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 136 "Modifications to silvicultural prescriptions for the action alternatives were made during the analysis to move toward the desired levels of green tree retention." SDGFP suggests the FS could provide further modifications in MA3.7, OSR for Alt. C since it leaves the LEAST number of snags and green trees > 10" dbh. Explain why Alt. D has mitigation, but not in Alt. C?

Agency Response:

As stated on pg. 136, paragraph 3, 20-40 green trees per acre average across the watershed (25% of which are the largest diameter class available) are retained to provide snag replacements. Since the green tree snag replacements are based on an average across the watershed, not all treated sites will retain 20-40 green trees per acre. As stated in the Prairie DEIS (pg. 137, last paragraph), creation of snags was included as mitigation to increase snag densities in Alt. D only, because there is no prescribed burning (as in Alt. B and C) to create snags in Alt. D, thus snag densities were projected to be lower than in Alt. A by 2012. The ID Team determined there was a need to address this decrease in snag density below those in the No Action alternative, thus developed mitigation to create snags in Alt. D. Prescribed burning in Alt. B and Alt. C is projected to increase snag densities

Letter No: 77 **Comment No:** 44 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 95: Define "liberation cut" Alt. D and how it differs from OSR?

Agency Response:

Liberation cuts are described in Chapter 3 - page 95 of the DEIS.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 45 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 91: Alt. C Hardwood Release and Restoration: Define these two terms, please. Release 736 acres, restore 48 acres for a total of 784 acres (assume additive?). Then how did table 2-1 arrive at 959 acres (non-commercial pine removal) and 480 (commercial pine removal) while we realize there is probably some overlap with the 959 and 480 acreages. 959 less 784 acres=175 acres--What happened to these acres? Are these "inclusions"? Table and Text don't jive. Please better explain. Treatment of inclusions is GREAT!! "Hardwood dependent wildlife species will have increase habitat", although only by 198 acres and only if regeneration is allowed to reach maturity which could take years, if ever. What are plans to "restore". How will regeneration be protected for the first 5 or so years? Will there be RX burns in hardwood stands and if so, don't burn off the regeneration. Will livestock grazing be deferred in these areas in late August - end of season?

Agency Response:

Hardwood release treatments remove pine encroaching on established hardwood sites. Hardwood restoration also removes pine from hardwoods but in the later case, the pine has successfully invaded the site to an extent that it is the predominant tree species. The table will be checked for discrepancies. Protection of hardwood regeneration is planned. The Forest Service and your office are currently establishing study plots to determine effective treatments, some of which we will incorporate in this project.

Letter No: 77 **Comment No:** 46 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 91: Aspen Regen (and any alternatives). DO NOT clearcut aspen!!!! This does NOT guarantee "release or restoration"!!! SDGFP has many recommendations from Drs. Dale Bartos and Wayne Shepperd, and others, for more effective treatments. SDGFP presented many of these possibilities to Mystic Staff on July 24, 2003, and request that those particular comments be included in the Administrative Record as part of our recommendations. In the interest of the looming deadline for this project, we will deliver copies of articles, citations, and recommendations to your staff. SDGFP requests that the FS consider hinging and slash treatments for natural

Agency Response:

The method of aspen regeneration referred to in the Prairie DEIS (pgs. 91, 141) as the coppice method of regeneration has been used on hundreds of acres across the Black Hills National Forest for over twenty years with very few failures. This method has been employed with no implied guarantee of successful regeneration. The coppice method is also supported by Forest Plan Standard 2408 as an acceptable silvicultural system. All sites treated with this method are monitored post-treatment to determine effectiveness. If monitoring were to indicate regeneration problems with a substantial number of treated stands (which it has not, to date), treatments methods will be reevaluated at that time. Treatments are implemented with limitations on timing (i.e. aspen is not cut between June 1 and September 30) because previous experience has indicated that treatments during this time period are not as effective in stimulation of suckering, possibly due to decreased water availability. Perhaps the difficulties regenerating aspen as noted by Dr. Bartos and Dr. Shepperd at other locations in the western United States were caused by factors not at work in the Black Hills. The information shared with Mystic staff on July 24 was noted, some of which will be incorporated in future prescriptions. However, it should also be noted that since the method of regeneration the Forest has been employing has proven to be successful over the past 20 years, any changes to that method should be implemented conservatively.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 47 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 92 Meadows (Alt. C): 3018 ac. Meadows, treating 779 acres or 26% (Alt. B=693 acres of 23%- not a significant difference between alternatives). SDGFP recommends that the FS could do more RX burning to treat additional meadow acreage in Alt. C. While we are glad that there will be an additional 49 acres of meadow (Alt.C), we assume these acres are not contiguous or in big blocks and therefore, hardly constitute significant increase in wildlife habitat or fuel breaks. Remove all pine - we support this.

Agency Response:

Your comments have been noted.

Letter No: 77 **Comment No:** 48 **Resource:** Plan

South Dakota Department of
Game, Fish and Parks

Comment:

Why is this called "Prairie" if only 10% cover types is grass and only treat 23-26% meadows?

Agency Response:

The Prairie Project is named after Prairie Creek which runs through the western portion of the project area.

Letter No: 77 **Comment No:** 49 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 92: Patch Clear Cuts (Alt. C). 85 acres: sizes from 2-22 acres!!! Wow, a few biggies (relatively speaking). How does "broadcast burning" differ from "RX burning". SDGFP appreciates inclusion of our recommendations for PCC's. However, we request that the FS explore additional opportunities to increase the small-sized patches (2-4 ac) and/or add more PCC's to the project area along canyon rims, etc. We will assist in additional analysis upon

Agency Response:

Your comments have been noted. Broadcast burning is one method of prescribed (Rx) burning where a relatively large area is burned. An example of another method of prescribed burning would be pile burning where one burns only slash piles. Chapter – 6 Page 237 of the DEIS has a glossary of terms with further definitions.

Letter No: 77 **Comment No:** 50 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 92: RX burning (Alt. C): 4224 acres of moderate intensity. Less than moderate will be a waste of time, money and effort. Approve moderate to high intensity. Need to regain open spaces as illustrated in Table 3-6 Landscape Vegetation, page 103. Meadows were at 40% of landscape in 1875 and now at 6.1%, Forest-wide. The jump from 0.3% in 1973 to 6.1% in 2000 is probably due to wildfires and not active management?? Please better explain.

Agency Response:

Attempting to prescribe burn within the wildland/urban interface at a high intensity level would significantly increase the risk of an escaped wildfire.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 51 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

"Stands that will be seed cut generally will not be RX burned unless other resource needs dictate otherwise." Define "other resource needs" Like what?

Agency Response:

In some areas seed cuts may be burned to promote grasses that will inhibit regeneration, especially adjacent to high value areas.

Letter No: 77 **Comment No:** 52 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Therefore, how will livestock grazing be managed to mitigate for fuels pre-burn and native vegetation establishment post-burn? With no current swing pasture or grass bank, how with the with the FS conduct Rx burning and livestock deferral both pre- and post burning? There was no mention in the economic section of this and have the livestock permittees been informed of the various situations and options? What are the various situations and options? SDGFP cannot support prescribed burning for the purpose of increasing vegetation diversity and reducing fuel loads if this subject matter is not clearer to the public. If RX burning is done to simply create short-term livestock forage, then state that. Please better develop this section and include a monitoring plan and mitigation.

Agency Response:

The purpose of the prescribed burns is to reduce the amount of ground fuels, remove some of the ladder fuels, and to raise the minimum tree heights. An increase in forage will probably occur as a secondary benefit. Individual burn plans will be prepared for each of the prescribed burns. Some burn plans recommend that grazing be deferred the year prior to burning. This may affect the entire allotment or just selected pastures. If grass is not the primary carrier fuel for the prescribed burn and it is not a fuel component that is needed or required to meet the management objectives, grazing may not need to be deferred prior to burning. Grazing is usually deferred for at least one season following a prescribed burn. The length of the deferment is dependent upon numerous factors including weather, plant recovery, plant vigor and litter establishment. There are no plans to increase the grazing allotment in the project area and there is sufficient grass and forage to sustain the current level of grazing. Increasing the amount of forage available to livestock is not a primary objective of the prescribed burns.

Letter No: 77 **Comment No:** 53 **Resource:** Range

South Dakota Department of
Game, Fish and Parks

Comment:

The DEIS stated that there will be no increase in AUM's. Please state how animal heads, animal months, season on and off dates, etc. could vary with vegetation treatments in all alternatives? Increase in forage should be for vegetative diversity and allow for forbs and shrubs to become established. Some allotments may have to have alterations in cattle removal by late August to give shrubs relief from late summer-fall browsing (find citations) This was not mentioned. Please better include mitigation to increase vegetative diversity to reduce pine with livestock grazing as a tool to achieve the goals and objectives of the PPA,

Agency Response:

Your comments are noted. AUM's refer to carrying capacity or the amount of forage that is produced and could be consumed by livestock. The statement that AUM's would not increase was incorrect. The numbers of AUM's available could increase but the number of permitted livestock will not. Additional forage that will become available may be used to change the distribution patterns of livestock grazing and provide for increased plant species diversity. Adjustments in pasture rotations and timing of use will be made on an annual basis and during the grazing season as necessary to provide successful vegetation management.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 54 **Resource**
Range

South Dakota Department of
Game, Fish and Parks

Comment:

Page 122: Grazing. Please better analyze to those allotments reviewed in the 1997 EA and accompanying Decision for identified resource concerns that could be addressed in this PPA and KV funds. Are there resource concerns along riparian areas and in sensitive soil areas that could be addressed through vegetation treatments, road closures, etc. etc.? Are there opportunities to conduct range betterment treatments or move livestock tanks, for example, with all the proposed hardwood and meadow treatments? Forest Plan direction and Phase I standards require that these opportunities to be addressed and these types of considerations were not mentioned. Page 125, Alt. B,C,D: If install additional pipelines, stocktank or relocate any, must follow FP direction Phase I. SDGFP understands that livestock allotment management plans are not within the scope of this PPA, but the impacts of livestock grazing (both pros and cons) are certainly within the treatment effects and resource concerns of this

Agency Response:

Comments noted. There are often opportunities to improve grazing management through Range Betterment and KV funding. Adjustments in range improvements such as fences and water sources are reviewed annually at the winter meetings with each permittee.

Letter No: 77 **Comment No:** 55 **Resource**
Range

South Dakota Department of
Game, Fish and Parks

Comment:

Page 125: Closure of some roads could have a "detrimental" effect. Define "detrimental" and how many operators. The table provided was greatly appreciated but the last column could be supplemented with "number of individual permittees". It would help to know how many individual permittees may be impacted and by what degree. All forest users will be impacted in some form or fasion by this project-and it is part of conducting a privledge at \$1.35 AUM.

Agency Response:

Your comment is noted. Detrimental effect as elaborated in the DEIS relates to reducing the efficiency of the permittee's operation. The cost of grazing is not just the fee paid to the Forest Service.

Letter No: 77 **Comment No:** 56 **Resource**
Range

South Dakota Department of
Game, Fish and Parks

Comment:

Page 125: Stuck Pasture (from Table 3-9) appears to be the only season-long pasture. 122 days of 46 cc pairs. To help the reader better understand analysis, compounding impacts, in juxtaposition to proposed treatments, please provide an allotment map. If it was provided and we missed it, we apologize.

Agency Response:

Comments noted. An allotment map is contained in the Project File and is available for review.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 57 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 93: Plant species composition (AltC): No mention of shrubs. When <0.4% of cover classes (Figure 3-1 page 68), there certainly should be more consideration for desirable native shrubs and reduction of snowberry. Again, more reason to defer livestock grazing, leaving slash in hardwood stands, etc. Please better explain how the FS can rejuvenate and maintain desirable shrub cover.

Agency Response:

Treatments planned to open up the canopy to sunlight, by reducing the competition from pine for water and nutrients as well as prescribed burning that reduces ground litter and stimulates many types of shrubs, will increase the amount of shrubs in the understory of pine stands and encourage plant diversity.

Letter No: 77 **Comment No:** 58 **Resource:** Veg

South Dakota Department of
Game, Fish and Parks

Comment:

Page 94: Regeneration (Alt C): While we concede emphasis in this Alt. Is for WUI, it seems to be some fear that the timber industry will not support this with continued reference to how treatments will or will not impact "Pine Regeneration". While you cannot satisfy all your constituents in any one Forest action, there certainly could have been more consideration in the text for how these treatments will impact vegetation diversity (both structurally, species, age, classes, etc.). This is the most radical vegetation treatment BHNH has undertaken in at least 10 years and the FS could do more to "sell" Alt. C vegetation treatments to many constituents. By polarizing interest groups (generalizing but -"pro-logging" vs. "no commercial logging") the FS tended to leave out those very valuable resource management concerns that will also contribute to reduction of fuel loads - that is an increase in vegetative diversity which benefits the forest as a whole and fits, hands in glove, with the mass movement across the West to better manage for healthy forests. Please sell yourself more for other benefits!!!

Agency Response:

Your comments have been noted.

Letter No: 77 **Comment No:** 59 **Resource:** Fire/Fuels

South Dakota Department of
Game, Fish and Parks

Comment:

Page 113 - Alt. C: Agree with bulleted points about lowering tree density, removal of "tweener" sized trees but we do not support loss of screening cover along major roads. Screening cover can also be in the form of mature deciduous shrubs. What are the options for shrub plantings as mitigation or ensuring shrub protection until they have reached 2-3 feet in height? 2,519 acres or only 10% of pine cover will be reduced to 40 BA (pine cover=24,606 acres). SDGFP recommends the FS take more acreage down to 40 BA, especially on south-facing slopes. Please explain why this is or isn't an option? It certainly would fit the goals and objectives of fuel

Agency Response:

Our experience from other treatments in similar habitats indicates that there will be a significant increase in shrubs when the Forest is opened up to a BA less than 60. There should be sufficient development of the understory vegetation to provide screening without additional planting. Over 7,600 acres of treatments proposed in Alternative C would reduce BA less than or equal to 60 ft². Advantages of having some areas with a BA in the 40-60 range is that spacing between trees significantly reduce the risk of an active crown fire but is dense enough to retard the proliferation of grasses and other flashy fuels that can significantly increase rates of spreads in

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 60 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 130, USDA FS 2002. Citation. SAIC's deer and elk paper was a very sketch draft, incredibly incomplete and should not be cited as a credible end product. It was only 12 pages of preliminary thoughts. SDGFP through Phase II was asked to provide our thoughts and we came up with a 28 page re-write. We have no idea how this re-write was accepted or will be used. For your information, SDGFP will not support this 12 page citation as proper deer and elk habitat management guidelines or even as credible literature review.

Agency Response:

Comment noted. The paper cited as USDA Forest Service 2000 on pg. 130 was used only as background information in the Affected Environment portion of the Wildlife Habitat section. It was not used as deer and elk habitat management guidelines, nor was it cited as such.

Letter No: 77 **Comment No:** 61 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 130: What is the smaller timber sale in Bald Hills for wildlife?

Agency Response:

The small timber sale currently underway in the Bald Hills is part of a larger ongoing restoration project to maintain, enhance, and restore the native prairie ecosystem, initiated and designed by the Mystic District wildlife biologist. The 250-acre commercial timber sale was developed to remove pine trees >9" DBH that are encroaching on prairie habitats, trees that could not be removed through prescribed burning or other methods. Other restoration projects include prescribed burning (a portion of which was completed in the spring of 2000), establishment of shrubs in draws, etc. The SDGFP was scoped during the NEPA process for this project, and according to comments received support restoration activities. Mystic staff would be happy to accompany SDGFP staff for an on-the-ground tour of the project area.

Letter No: 77 **Comment No:** 62 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 130: Table 3-10 coincides with Figure 3-1. Largest percentage of Wildlife SS is 4B. >9" dbh with 41-70% cc. Selective cutting should leave the biggest trees (Bosworth - it is not what we take, it is what we leave behind).

Agency Response:

It is anticipated that proposed treatments will be modified to emphasize leaving the largest trees, with the exception of treatments in hardwood stands, meadows, and patch cuts.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 63 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 132: Table 3-12. Explain how totals for SS4 can vary so much with Alt. B having no commercial harvest and yet the least amount of SS4??

Agency Response:

When the 4A, 4B, and 4C acreages are combined for each alternative, Alt. C results in 194 acres more SS4 than Alt. B, and Alt. D results in only 58 acres more than Alt. B. The differences in the amount of SS4 resulting in each alternative are not directly comparable, because they are attributable to a number of factors: Alt. C treats a substantially larger acreage with non-commercial thinning than Alt. B; different stands are treated in each alternative; and different treatments may be prescribed for the same stand in each alternative. Structural stages for each stand are calculated (both pre- and post-treatment) based on QMD (quadratic mean diameter), and BA (basal area) of trees >5" DBH (diameter at breast height). Both QMD and BA data are averaged across the stand and do not account for inclusions or trees that make up less than the majority of the stand. Changes in structural stages resulting from treatment are very complex, and depend on stand structure and composition prior to treatment and the particular treatment prescribed.

Letter No: 77 **Comment No:** 64 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 134: Table 3-15. Should depict approximate "commercial" acreages. Although not additive, about 8% of MA 3.7 (308 acres of 3858) will be commercially treated, not including meadow restoration. No commercial trees taken out of hardwoods. Need to emphasize that the largest diameter trees will be left, therefore, must be selective cuts not just a well manicured spacing treatment. Can the FS still achieve a reduction in canopy cover and bulk

Agency Response:

Table 3-15 has been modified to more accurately display acreages treated, and has been included in the Errata section of the Prairie FEIS. See also response to comment 77/36.

Letter No: 77 **Comment No:** 65 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 139: listing of activities, such as livestock grazing, have contributed toward degradation of stream's character and health contradicts page 123 that states "rangelands in this project area are in good to excellent condition. Please better depict forest and range health and refer to specific resource management concerns taken from past livestock EA's and Decisions.

Agency Response:

The statement referenced on pg. 139 lists causal factors (including livestock grazing) that have affected perennial stream health, in the context of riparian habitats. The statement on pg. 123 is made in reference to the condition of rangelands as a whole in the project area.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 66 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 140. What are the purposes of the dams? What are they mitigating for? Without more information, SDGFP supports these restorations in concept. We highly desire to bring better recreational fishing opportunities to these dams on Forest lands but need to know the purpose. We can better support such projects, offer constructive comments and offer fish stocking options if there is a guarantee that they are for public fishing waters and not for livestock watering. Thank you.

Agency Response:

As far as the Mystic staff can determine, both Victoria and Prairie Creek dams were originally constructed for recreational purposes. The statements on pg. 140, proposing dredging and maintenance of the dam structures as mitigation measures, were inappropriately worded. These projects are better described as proposed projects, since they are not intended to mitigate potential negative effects associated with other project activities. These projects were proposed by the Mystic District wildlife biologist to maintain and improve riparian habitats associated with these water impoundments, not to provide livestock watering sources. Without action, both dams will eventually become completely filled with sediment and no longer provide riparian habitats. As stated at the end of the referenced paragraph, a fence and cattleguard are also proposed upstream from Prairie Creek dam specifically to exclude livestock from the dam. The topographic setting associated with the Victoria Dam site does not lend itself to effectively excluding livestock, although no evidence of excessive livestock use was noted during a site visit by the wildlife biologist fall 2002, following a summer of severe drought. Specific project design criteria will be developed in coordination with SDGFP prior to implementation.

Letter No: 77 **Comment No:** 67 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

In the West, riparian areas are the most diverse ecosystem, followed by aspen. These facts could be brought forward more. SDGFP has many citations we can offer.

Agency Response:

Comment noted.

Letter No: 77 **Comment No:** 68 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 141. Will stands be properly typed as hardwoods and be taken out of the suitable timber base?

Agency Response:

As stated in the last full paragraph on pg. 141, "hardwood restoration ... proposed in all action alternatives ...[would] remove commercial and/or non-commercial invading pine ... from the sites, which would then be typed as and managed as hardwood sites." Hardwood stands are removed from the suitable timber base when they are reclassified from pine to hardwood.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 69 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 151, 155: Mt. Lions: Modifications. Mt. Lions are now a State Big Game Species although no hunting season has been proposed. Last sentence: Threats to the Mt. Lion: Replace "federal" with "state". The State has maintained jurisdiction to control predators and coordinates NEPA through APHIS. There is no federal predator control effort in South Dakota, unlike every other western State. Also add "vehicle collisions" to the list of direct threats.

Agency Response:

Suggested wording changes were made.

Letter No: 77 **Comment No:** 70 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Aquatic Species: While Alt. C may vegetatively treat the most acres, this alternative also is the least restrictive for motorized vehicles and off-road travel has the most road densities. Direct and indirect effects of roads, maintenance of roads, lack of law enforcement, road densities, etc. was not adequately analyzed except for some references to connected disturbed areas.

Agency Response:

In addition to the discussion of aquatic species on pgs. 151-154, direct, indirect, and cumulative effects to the physical, chemical, and biological components of aquatic ecosystems are discussed in detail on pgs. 50-61. Included in this section is lengthy discussion of the effects of the alternatives (including roads) on sediment, bed and bank stability, flow regimes, temperature and oxygen, water purity, and aquatic life. Additional discussion of instream fisheries habitat and the effects of the alternatives has been included in the Errata section of the Prairie FEIS. The Prairie Project File also contains further information.

Letter No: 77 **Comment No:** 71 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Mt. Sucker: GFP successfully proposed it as a R2 Sensitive Species (Erickson 2002, GFP Report). Unknown when this new list takes effect for analysis and may have limited application in Spring Creek above Sheridan Lake. Copy of report sent to Mystic Office via e-mail.

Agency Response:

Comment noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 72 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 155: American Dipper. Results of 2003 Dipper Survey can be found at:
<http://www.state.sd.us/gfp/DivisionWildlife/Diversity/dipper/Spring2003.htm> Below is a summary (taken from above citation) for those streams that may be impacted by Prairie. This information is not conclusive and does not negate the possibility of dippers nesting elsewhere or in parts of streams not easily accessed during the survey period. The full report and other documents do lend support to the fact that much of the historic dipper habitat has been lost due to degraded water quality, reduced water yields, reduced food sources, impoundments and other impacts to streams and riparian areas. Rapid Creek - 2003: Thoroughly checked the creek from Dark Canyon upstream to Hisega the Thunderhead Falls area, and from Canyon City to Silver City. One active nest with five eggs was found on April 29 and this nest was still active on May 15th, chicks were in the nest. Despite availability of many good nest sites there appears to be only one pair of dippers on the stream. There was no sign of old nests at the many apparently suitable nest sites that were checked except at Thunderhead Falls. The owners of Thunderhead Falls reported that dippers did not nest there last year or this year, but a dipper nest is visible just inside the tunnel. The tunnel was gated when we checked on April 29, preventing access to the site by dippers. Spring Creek - 2003: Surveyed a large portion of Spring Creek, above and below Sheridan Lake, downstream to the Storm Mountain area, 5/10/2003. No dippers or evidence of dipper nests reported, same results as past surveys.

Agency Response:

Information from Results of 2003 Dipper Survey has been added, and is included in the Errata section of the Prairie FEIS.

Letter No: 77 **Comment No:** 73 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 157: Big Game. Move Mt. Lions to this section.

Agency Response:

Comment noted.

Letter No: 77 **Comment No:** 74 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Page 157: Big game, poor habitat, disturbances. Alt. C: Screening cover from known 3% to 2% along arterial and collector roads. We do not support reduction of more screening cover along major roads (paved and gravel). With the WUI, there is frequent shooting violations in the area.

Agency Response:

Commentor's opposition to reduction in screening cover along arterial and collector roads is noted. See also response to 77/37.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 75 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

HABCAP, Thermal Cover, etc.. Excellent summary here and very clear research review. SDGFP agrees that there are flaws in HABCAP and agree that the model indicates an emphasis on thermal cover over food production as taken from Cook et al. (1998) (page 160, PPh 4). SDGFP information on deer movements supports that there is depleted summer range (supported by various central Hills studies already cited in DEIS) and deer are forced to move to winter range earlier than historically documented. And in many areas of the BH, winter range is not adequate. Deer move into winter range and cold weather not in top condition

Agency Response:

Comment noted.

Letter No: 77 **Comment No:** 76 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

How does the FS estimate species and abundance in the term "forage". When shrubs are <1% of cover types, we suggest that this area is highly lacking in desirable shrubs and forage quality as supported by Deperno 2002. Deperno also found that deer selected dense canopies of PINE to avoid heat stress - that statement must be taken with realization of what deer had to choose from - crappy pine - they chose what was the best of the worst. Given a preference of available cover, deer will also select hardwood stands and/or mature shrubs. Deperno's study does NOT to advocate management of dense pine for thermal cover and the public should be better informed on his work and results. If given poor habitat or terrible habitat, an animal will select the best of the worst, which is not to say that is how we should manage. Also, for the public's benefit, at this time and in this particular project area SDGFP is NOT advocating an increase in deer numbers due to various habitat treatments, but

Agency Response:

The term forage as used in the Prairie DEIS refers to vegetation consumed by wildlife, particularly ungulate wildlife, as well as livestock. There is no implied estimation of species and abundance inherent in the use of the term. Quality, quantity, and diversity of deer and elk forage are discussed in the Big Game section. Clarification of the comment is necessary to respond further. The percentage of shrubs shown in Figure 3-1 (pg. 76) and Table 3-10 (pg. 130) is based on stands that are predominantly composed of shrub species and thus typed as a shrub community. Although not reflected in the figure and table, a much larger percentage of the project area supports shrub species; shrubs, however, are not the dominant species of those stands. Throughout the Prairie Project Area, many stands dominated by and classified as pine, bur oak, aspen, or meadow support inclusions or understories of shrub species. The presence of shrubs in the understory of pine stands is dependent on the amount of canopy closure in any particular stand. Remainder of comment noted.

Letter No: 77 **Comment No:** 77 **Resource:** Wildlife

South Dakota Department of
Game, Fish and Parks

Comment:

Therefore, while SDGFP wants to have increase understory production and regeneration of hardwoods, those species must be able to "swamp the herbivore system" in terms of abundance and distribution AND survive to become mature shrubs and hardwoods. Otherwise, the treatments will only provide a short-term benefit and overall habitat diversity for these and other species will continue to diminish. We do not argue with reduction of what little bit of thermal cover exists in Project Area, based on criteria used to measure thermal cover - pine. More concerned about quality, distribution and sustaining forage in the project area.

Agency Response:

Comment noted.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 77 **Comment No:** 78 **Resource**
Plan

South Dakota Department of
Game, Fish and Parks

Comment:

Conclusions: Regarding Alt. C, SDGFP highly supports something that is different than the Forest Plan direction Alternative D and we do not support Alt.A. With one major exception in travel management noted below, we would generally support Alt. C, with the following changes and/or stipulations. First, we highly support and agree that there should be a radical reduction of small-diameter pine and that BA's should be taken below FP standards. We do not understand how traditional seed tree and OSR treatments will achieve these goals but will only add to more rapid regeneration of pine. We believe the FS certainly could do more RX burning. Do NOT clearcut aspen or any hardwoods. We recommend a second look for additional meadow restoration treatments, riparian area pine removal treatments, increased opportunities to increase patch clear cut sizes (and more of them). With the intensity of on-the-ground implementation with Alt. C, we believe a few more stipulations in marking timber should be considered like reducing more areas ie: southern exposures, to a 40 BA, selective cutting to removal of larger diameter pine from MA's especially from MA 3.7 and ask that the FS look at recommendations for selective cuts where in the largest diameter pine will be retained. How will desirable native vegetation be monitored for positive responses to various treatments? How will livestock be managed both pre-and post-RX burning? We ask the FS to seriously look at opportunities to provide even more effective fuel treatments with our suggestions.

Agency Response:

SDGFP support for Alternative C with exceptions regarding travel management is noted. All action alternatives plan to thin smaller diameter pine. Regeneration sites will require periodic maintenance (thinning) to meet fuels reduction objectives. Alternatives B and C have substantial acres of prescribed burning planned. Consideration has been given to the recommendations regarding hardwood and meadow treatments, thinning to lower basal areas on some sites, leaving larger trees, timing of livestock grazing and prescribed burning and monitoring of vegetative response to various treatments.

Letter No: 77 **Comment No:** 79 **Resource**
Trvl/Rec

South Dakota Department of
Game, Fish and Parks

Comment:

The one aspect we cannot support in any form or fashion is the travel management plan in Alt C. We support Alt. B travel management as being more resource protective and mitigation for past and reasonably foreseeable future impacts and damages. The FS failed to support and defend how Alt. C will meet resource protection needs. We understand the Districts' desire to provide an opportunity for year-round off-road travel and support the current area west of Norris Peak Road and North of 44 for that purpose. There was not the effective and defensible mitigation offered in Alt. C for all the soil, water, habitat, and wildlife disturbances that have occurred and will continue to occur in this project area.

Agency Response:

SDGF&P's support for travel management direction contained in Alternative B is noted. The effects of implementing Alternative C are presented in Chapter 3 of the DEIS. Resource related effects are clearly improved in Alternative C compared to the existing condition. Goal 4 of the Purpose and Need for the Project relates to recreational opportunities. Recreation effects were also considered in the analysis, in addition to

Letter No: 77 **Comment No:** 80 **Resource**
Plan

South Dakota Department of
Game, Fish and Parks

Comment:

Thank you for the opportunity to comment on such a creative project! Please let us know if we can be of further assistance. Again, there were numerous tables, figures and information that we greatly appreciated being included in the Draft EIS. We offer those notes if they are of interest to your staff.

Agency Response:

Your comments and offer are noted. Thank you for your interest and involvement in the Prairie Project effort.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 1 **Resource:** Plan

Region VIII Environmental Protection Agency

Comment:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the "Prairie Project Area (Lower Rapid Creek Area)" Draft Environmental Impact Statement (DEIS). Our review is in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act to evaluate the overall impacts to human and natural environments.

Agency Response:

Comments regarding EPA's reviewer status responsibilities under NEPA and the Clean Air Act are noted.

Letter No: 78 **Comment No:** 2 **Resource:** Hydro

Region VIII Environmental Protection Agency

Comment:

We [EPA] recommend that the Forest Service quantify the effects of the proposed project on soil erosion, sedimentation, and aquatic ecosystems, as was previously done for the Black Hills National Forest's "Elks, Bugs and Fuels Project." That project is similar to this proposal in size and its Purpose and Need and provided quantified information to determine the relative environmental impacts to those resources. Soil and water resources are primary concerns for EPA. Please provide additional information in the Final EIS to determine the project's overall effects to soil and water resources and their environmental significance, and to determine whether additional mitigation practices may be practical.

Agency Response:

The analysis presented in the Watershed Report, located in the project file, follows the regional policy set forth in 'NEPA Guidance for Watershed, 1996.' Effects to the soil are directly related to the amount of activity. Effects to the aquatic ecosystems are directly related to the amount of activity within the WIZ. Comparing alternatives with this information provides a detailed comparison of the effects to the soil and aquatic ecosystem. More detailed information can be found in the Watershed Report located in the project file.

Letter No: 78 **Comment No:** 3 **Resource:** Fire/Fuels

Region VIII Environmental Protection Agency

Comment:

To evaluate the potential effectiveness of the alternatives, Final EIS should quantify how much land that is treated under each alternative is adjacent to or near private property. Quantified measures would support the DEIS's objectives for this Issue (page 15), EPA concurs that management actions to reduce the risk of catastrophic wildfire are most likely to be successful where protection is focused on wildland-urban interface zones and near

Agency Response:

Table 2-1 show the miles of fuelbreaks that will be constructed adjacent to private property. Maps 4-8 in the appendix illustrates where the various treatments will occur and maps 10-17 shows the effects of these

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 4 **Resource:** Fire/Fuels

Region VIII Environmental
Protection Agency

Comment:

If the amount of fuel breaks created is used as a measure of treatments near private property, Table 2-1 (page 44) identifies total acreage of 1,738 acres of fuel breaks under the Preferred Alternative, or approximately 15 percent of the total area treated. Focusing additional efforts on fuel breaks or other practices near private property and structures would increase the effectiveness of fire risk reduction. Allowing natural forest succession in areas that do not have private/urban use values would better support wildlife habitat and other goals such as old-forest structure and water quality.

Agency Response:

Protecting private lands is only one of the objectives. Other objectives include mitigating the effects that large crown fires have on the soils, vegetation, aesthetics, wildlife and watershed resources.

Letter No: 78 **Comment No:** 5 **Resource:** Wildlife

Region VIII Environmental
Protection Agency

Comment:

The Final EIS should more clearly state how habitats and populations of sensitive wildlife species may be affected. Discouraging natural forest succession, by harvesting ponderosa pine to enhance hardwood stands, counters objectives for mature ponderosa pine forest and associated meadow habitats. By discouraging natural succession, the proposed actions may increase the long-term risk of wildfire in back-country areas that are not near or adjacent to the wildland-urban interface zone.

Agency Response:

The Prairie BA/BE (located in the project file) evaluates the effects of project activities on sensitive wildlife and plant species, and their habitats. The Forest Plan provides specific direction to manage and conserve hardwood communities (Objective 201, Standards and Guidelines 2201 through 2207). Hardwood communities are discussed in the Prairie DEIS (pgs.140-142). Such communities provide valuable vegetation and structural diversity (and thus wildlife habitats) not otherwise found in the larger ponderosa pine ecosystem. Several Region 2 sensitive species (particularly plants) are closely associated with and dependent upon unique habitats provided by hardwood communities (Prairie BA/BE, located in the project file). Hardwoods comprise only 4% of the entire Prairie Project Area, whereas the pine community dominates 85% of the project area. Hardwood communities often follow drainage bottoms, and this topographical location combined with the presence of higher moisture levels and less flammable foliage relative to surrounding pine stands, make them valuable as natural fuelbreaks (Prairie DEIS, pg. 140). Hardwood communities and planned activities to remove encroaching pine from them both contribute to landscape-scale fuelbreaks across the Prairie Project Area. Meadows also provide unique habitats not found elsewhere within the greater forested ecosystem, but due to fire suppression, many meadows are being encroached upon by adjacent ponderosa pine. The Forest Plan provides direction to restore and maintain meadows (Objective 205). Meadows communities and planned activities to remove encroaching pine are addressed in the Prairie DEIS (pg. 142-143).

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 6 **Resource:** Wildlife

Region VIII Environmental
Protection Agency

Comment:

The DEIS discusses the limitations of the Preferred Alternative to support older-growth forest habitats, and it is the alternative that provides for the least amount of closed-canopy and late-succession habitats that are important to MIS such as the northern goshawk (pages 144-149). Merriam's turkey habitat would be improved, but the overall impacts to other MIS (brown creeper, mountain lion, brook and brown trout, and mountain sucker) are unclear from the discussion (pages 150 to 154). It appears that the project would adversely affect species that are dependent on late-succession forest habitats. As stated in the recent Elk, Bugs, and Fuels Project DEIS, in the Black Hills National Forest there is, "a lack of large trees as well as late and old forest structure...across the landscape: (page

Agency Response:

Late succession habitat is discussed in the Prairie DEIS (pgs. 134-135). Trees in the largest diameter classes would be retained in all treated areas. Alt. C treats 8% of Management Area 3.7 commercially; the remainder of treatments in this management area are either non-commercial, or remove encroaching pine from hardwoods or meadows. Non-commercial treatments which remove only pine smaller than 9" DBH, and removal of encroaching pine from hardwoods and meadows would not substantially alter the character of the late succession landscape. The brown creeper is discussed on pgs. 150-151 of the Prairie DEIS. As stated on pg. 151 of the Prairie DEIS, effects of project activities on the mountain lion, including both vegetation treatment and travel management, would closely mirror effects to big game species (primarily deer), the mountain lion's preferred prey. Big game species and the effects of management activities are discussed in detail in the Prairie DEIS (pgs. 157-163). In addition to the discussion of aquatic species on pgs. 151-154, direct, indirect, and cumulative effects to the physical, chemical, and biological components of aquatic ecosystems are discussed in detail on pgs. 50-61. Included in this section is lengthy discussion of the effects of the alternatives on sediment, bed and bank stability, flow regimes, temperature and oxygen, water purity, and aquatic life. Additional discussion of instream fisheries habitat, including aquatic MIS, and the effects of the alternatives has been included in the Errata section of the Prairie FEIS. The Prairie Project File also contains further information.

Letter No: 78 **Comment No:** 7 **Resource:** Fire/Fuels

Region VIII Environmental
Protection Agency

Comment:

Given the evolving understandings about fire management and the conflicting anecdotal information and science on fire behavior, EPA urges the Forest Service to consider setting priorities for treatments where the effectiveness for fire prevention is maximized and adverse environmental impacts may be minimized.

Agency Response:

Comment is noted. One of the reasons, fuels management was an emphasis of the Prairie Project is the close proximity of the project area to the urban interface and the fact that the Interdisciplinary Team felt that the land could be managed to reduce the potential of a catastrophic fire with minimal environmental impacts. The analysis and disclosure of effects confirms this.

Letter No: 78 **Comment No:** 8 **Resource:** Fire/Fuels

Region VIII Environmental
Protection Agency

Comment:

Focus treatment in areas near and adjacent to private property and recreation facilities for fire by using mechanical thinning, prescribed fire, and fuel breaks.

Agency Response:

All of the private boundaries have been surveyed. Treatments including fuel breaks, thinnings and prescribed burning has been recommended in the areas where the ID Team felt that active management would improve fire

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 9 **Resource:** Wildlife

Region VIII Environmental
Protection Agency

Comment:

For areas that are managed for commercial timber production, emphasize harvest first in those areas that have system roads and minimize the impacts to important wildlife habitats and aquatic ecosystems.

Agency Response:

Design criteria and mitigation measures (Prairie DEIS Appendix B) were developed as part of the action alternatives. These measures will minimize impacts and protect unique wildlife habitats and aquatic ecosystems.

Letter No: 78 **Comment No:** 10 **Resource:** Fire/Fuels

Region VIII Environmental
Protection Agency

Comment:

In other areas, consider allowing ponderosa pine systems to move towards late succession forest over some portion of the project area by limited management practices (for example, using prescribed fire) or, where possible, by eliminating active management. The goal for such practices would be (1) to enhance wildlife habitat and other ecological values in areas that are most important to sensitive and important wildlife, and (2) to study fire risk and behavior in less disturbed areas.

Agency Response:

The Forest Plan has identified 3,858 acres within the project area to be managed for late successional forests. Late successional forest does not always equate to a forest that is not susceptible to large catastrophic fires nor are they necessarily sustainable over time. Stand density, minimum crown heights, and composition are just as important in determining the susceptibility of these stands to crown fires. Most of the trees being treated are between 9 and 14 inches in diameter and are approximately 90-110 years old. Silvicultural prescriptions can be developed that will retain the larger, older trees that remain.

Letter No: 78 **Comment No:** 11 **Resource:** Trvl/Rec

Region VIII Environmental
Protection Agency

Comment:

In the DEIS, the Preferred Action proposes to close 46 miles of roads and decommission (obliterate) 50 miles of roads. Obliterating roads, particularly in area such as the Prairie Project with exceptionally high road density, is among the best means to restore aquatic habitat impacted by sediment. Detrimental effects of roads include habitat fragmentation, water channelization, sediment transport, noxious weed introduction and dispersal, and increased human use and concentration. We commend the Forest Service in developing an overall reduction in the total miles roads and motorized trails, and obliterating a significant number of existing roads, as part of the Preferred Alternative. That reduction will support the fire risk reduction objectives the project too.

Agency Response:

Thank you for your support of the Prairie Project proposal regarding closing and decommissioning of roads.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 12 **Resource:** Trvl/Rec

Region VIII Environmental
Protection Agency

Comment:

Please clarify in the Final EIS how many miles of new and existing roads, particularly near private lands, will be closed or obliterated. Where new roads are constructed and existing roads are improved. The Preferred Alternative may increase the use of motorized and non-motorized recreation on those roads. For those new roads constructed near existing residential and other private lands to create the proposed fuel breaks, the risks of adverse impacts will increase in both those areas and in more easily accessed back country areas. Greater noise and other nuisances for nearby residents also may occur if new roads near private lands are kept open following the project's

Agency Response:

The Final EIS and Record of Decision will state the number of roads to be closed or obliterated. The DEIS presents the miles of road closed or decommissioned for each alternative in Table 3.3. Map 18 in Appendix E of the DEIS, Existing Travel Management Map (Alternative A), displays existing roads within the Project Area. Maps 19, 20 and 21 display the roads and trails that would remain on the landscape under the respective Alternatives. Any new temporary roads constructed for the Project would be obliterated; any new roads constructed would be closed to public motorized use. There are three miles of new roads that would remain on the landscape but closed to public motorized use under Alternative C and one mile under Alternative D (Table 3-1 of the DEIS).

Letter No: 78 **Comment No:** 13 **Resource:** Plan

Region VIII Environmental
Protection Agency

Comment:

EPA evaluates the potential effects of proposed actions and the adequacy of the information in a DEIS. The Proposed Action (Alternative C) and Alternatives A and D are rated "EC-2" (environmental concerns, insufficient information) under EPA's ratings criteria (enclosed). Alternative B is rated "LO" (lack of objections). The "EC" rating means that the Alternative does not require substantial changes, but EPA has identified environmental impacts that should be avoided to fully protect the environment. The EC ratings are based on EPA's concerns regarding the potential adverse impacts to water quality, soil erosion, and wildlife habitats. The potential for significant environmental degradation can be reduced by modifying the referred Alternative to (1) enhance actions in the wildland-urban interface zone, (2) reduce natural succession to mature ponderosa pine forest structure in back country and important wildlife habitats. The LO rating means that EPA's review did not identify any potential environmental impacts that require substantive changes. The "2" rating means that the DEIS lacked sufficient information to thoroughly assess an alternative with the potential to achieve objectives to minimize fire risk while minimizing or fully mitigating the adverse environmental impacts to soil, water, wildlife, and other resources. Impacts to those resources could be quantified and better described in the Final EIS.

Agency Response:

EPA's clarification of their rating protocol is noted. The Prairie Project ID Team has endeavored to respond to the review comments by providing additional clarification as documented above after each specific comment. Clarification has been provided regarding specific activities and methodology planned for under Alternatives C and D to: 1) enhance actions in the wildland-urban interface; 2) reduce vegetation treatment impacts to important wildlife habitat; and 3) encourage natural succession in "back country" and important wildlife habitats. Additional specific description of vegetation treatment, information, mitigation and quantification regarding these alternatives is provided in the EIS, Chapters 1 and 2 as well as the project file (specific materials available upon request). The tables at the end of Chapter 2 display detailed comparative summaries of the effects of each alternative and respective alternative treatment activities. Effects are compared based on quantitative and qualitative measurement indicators as described. Detailed description of impacts to soil, water, wildlife and other resources are presented in Chapter 3 of the EIS. Disclosure of impacts is provided in both quantitative and qualitative terms.

Prairie DEIS Public Comment and Agency Response Report

Letter No: 78 **Comment No:** 14 **Resource:** Plan

Region VIII Environmental
Protection Agency

Comment:

Thank you for your willingness to consider our comments as you prepare the Final EIS. If you have any questions or would like to discuss our comments, please contact Brad Crowder of my staff at (303) 312-6396 or by email at crowder.brad@epa.gov.

Agency Response:

Thank you for EPA's review and comments regarding the Prairie Project DEIS.

Letter No: 78 **Comment No:** 15 **Resource:** Hydro

Region VIII Environmental
Protection Agency

Comment:

We offer a number of comments and questions to provide further clarification in the Final EIS. These suggestions include: Quantify soil erosion and stream sedimentation impacts to better understand the differences among alternatives.

Agency Response:

Quantification of soil erosion and stream sedimentation was indirectly done in the Watershed Report. Effects to the soil are directly related to the amount of activity. Effects to the aquatic ecosystems from sedimentation are directly related to the amount of activity within the WIZ. Comparing alternatives with this information presents a detailed comparison for the effects to the soil and aquatic ecosystem. More detailed information can be found in the Watershed Report located in the project file.

Letter No: 78 **Comment No:** 16 **Resource:** Wildlife

Region VIII Environmental
Protection Agency

Comment:

We offer a number of comments and questions to provide further clarification in the Final EIS. These suggestions include: Quantify wildlife and habitat impacts to more easily understand the differences among alternatives.

Agency Response:

The effects of the alternatives to wildlife habitat are discussed in Chapter 3 of the Prairie DEIS (pgs. 129-173). Some components of wildlife habitat are quantified (e.g. acres of hardwoods, estimates of snag density), however, not all habitat components lend themselves to quantitative analysis (e.g. quality of riparian habitats).

Letter No: 78 **Comment No:** 17 **Resource:** Fire/Fuels

Region VIII Environmental
Protection Agency

Comment:

We offer a number of comments and questions to provide further clarification in the Final EIS. These suggestions include: Focus fire risk reduction treatment in wildland-private land interface areas to maximize the effectiveness of those practices.

Agency Response:

See response to Letter 77 Comment(s) 7 and 8.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
78	18	Wildlife

Region VIII Environmental
Protection Agency

Comment:

We offer a number of comments and questions to provide further clarification in the Final EIS. These suggestions include: Consider optimal habitat management practices particularly in important wildlife habitat areas for species listed as Management Indicator Species (MIS).

Agency Response:

It is unclear what the commentor is referring to as "optimal habitat management practices." Design criteria and mitigation measures (Prairie DEIS Appendix B) developed as part of the action alternatives will minimize impacts and protect unique wildlife habitats and aquatic ecosystems.

Letter No:	Comment No:	Resource
79	1	Wildlife

Johnson

Sara

Comment:

You have no monitoring data for MIS or sensitive Species. You have no conservation strategies for most MIS and all sensitive species.

Agency Response:

Monitoring protocols have been developed and updated (US Forest Service 2003), as directed by the Forest Plan (pgs. IV-1 through IV-7) for all Management Indicator Species (MIS) and many sensitive species, as well as numerous habitat components such as late succession, snags, down woody material, etc. Results of monitoring activities are published annually (USDA Forest Service 1998, 1999, 2000, 2001, 2002, 2003 in press). Budgetary constraints may limit monitoring activities in any give year to those required by law or regulation. The Forest has contracted with the Rocky Mountain Bird Observatory to provide statistically rigorous, long-term monitoring and population trend data on most diurnal, regularly breeding bird species in the Black Hills. However, since this monitoring program is only in its third year, it is too soon to assess whether population sizes are changing, and if so, whether trends are positive or negative. As stated on pg. 144 of the Prairie DEIS, the Forest's annual Monitoring Reports (as referenced above) present results of annual monitoring activities, including population estimates for some species. In addition, northern goshawk nesting activity is monitored annually, the results of which are published in the Forest's annual Monitoring Reports (as referenced above). The Forest Plan and Regional direction provide for protection and management of MIS and sensitive species. MIS species are addressed in the Prairie DEIS (pgs. 144-154). "Conservation strategies" are identified in project specific mitigation, the Revised Forest Plan, and the Phase I Amendment.

Prairie DEIS Public Comment and Agency Response Report

Letter No:	Comment No:	Resource
79	2	Wildlife
Johnson		Sara

Comment:

You have not incorporated the recommendations provided by your wildlife experts (USDA 2000). You have no criteria in place to measure environmental impacts on wildlife.

Agency Response:

The document cited by the commentor, the "Expert Interview Summary for the Black Hills National Forest Land and Resource Management Plan Amendment" (USDA Forest Service 2000), summarizes results of interviews conducted to obtain information on Region 2 sensitive species for use during development of the Phase I Amendment to the Forest Plan (USDA Forest Service 2001e). The purpose of the interviews was to gather as much information as possible about risks to sensitive species, and obtain suggestions on strategies to address weaknesses with regard to sensitive species in the 1997 Forest Plan or in the Interim Direction provided in the Washington Office appeal decision. Information and recommendations from the interviews were incorporated into the Phase I Amendment, including modification of and development of additional Forest Plan Standards and Guidelines. The Prairie DEIS, as stated on pg. 5, tiers to the Forest Plan as amended by the Phase I Amendment.

In addition, since the document cited by the commentor addresses Region 2 sensitive species specifically, it was relied upon heavily and was incorporated into the development of the Prairie BA/BE (located in project file). Different criteria are used to measure impacts to different species. As an example, open road densities and habitat effectiveness values are used to measure impacts to deer and elk habitat; snag densities are used to measure impacts to snag dependent species; other quantitative measures are used such as number of acres of mature ponderosa pine currently, treated, and left after treatment, for species associated with mature forest. Mitigation measures are in place to avoid or reduce effects. The Forest performs monitoring on an annual basis to determine whether changes in Forest Plan direction and implementation are necessary. These monitoring activities include numerous wildlife habitat-related components. Refer to Comment Response 79/1 above.

Letter No:	Comment No:	Resource
79	3	Wildlife
Johnson		Sara

Comment:

You have not demonstrated how this program will maintain viability of old growth and forest interior wildlife.

Agency Response:

Species viability is beyond the scope of the Prairie DEIS. Late succession forest is addressed on pgs. 134-135. The Revised Forest Plan and the Phase I Amendment contains no specific direction for interior habitat. Project analysis indicates that no threatened, endangered, sensitive, or management indicator species would be substantially affected by project activities.

Letter No:	Comment No:	Resource
80	1	Trvl/Rec
Letcher		Mike

Comment:

I am opposed to any closures of trails to motorized vehicles.

Agency Response:

Your opposition to closing trails to motorized users is noted.

