

management factors. We make this comment because of the significant uncertainty about fish and wildlife population impacts from the newly proposed management direction in the Preferred Alternative and in other alternatives. Monitoring results should be available to biologists and Forest managers, as well as other stakeholders such as Forest users and environmental and natural resource agencies.

Another concern is the lack of quantified resource objectives for aquatic and other resource improvements. For example, riparian objectives (e.g., late seral or mid-seral vegetative condition, bank stability) could provide clear thresholds for impacts to trigger a change in management direction if resource improvement objectives do not meet Forest Plan objectives. Similar factors should be considered for vegetation and other resources. Taking livestock grazing as an example, events such as drought, catastrophic fire or other natural catastrophes, unforeseen forage production and condition, noxious weed infestation, and impacts on sensitive native species, for example, may support reducing or removing livestock for certain periods. The threshold for those actions would be vegetative or riparian conditions.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

00313



United States Department of the Interior



OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 56, Room 1003
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

December 16, 2004

ER 04/0697

Rick Cables, Regional Forester
Rocky Mountain Region
USDA Forest Service
740 Simms Street
Golden, CO 80401-4720

Dear Mr. Cables:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Black Hills National Forest Land and Resource Management Plan, Phase II Amendment and provides the following comments pursuant to section 7(a) (2) of the Endangered Species Act of 1973, as amended (50 CFR §402.13), the Migratory Bird Treaty Act, 16 U.S.C. § 703-712, the Bald and Golden Eagle Protection Act, 16 U.S.C. 668, the National Environmental Policy Act of 1969, as amended, 42 U.S.C. 4321 and the Fish and Wildlife Coordination Act, 48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*

General Comments

The Black Hills National Forest (BHNF) lies within Crook and Weston Counties in Wyoming. The federally listed species that may occur in these counties and addressed in the DEIS are the threatened bald eagle (*Haliaeetus leucocephalus*), the experimental, non-essential population of gray wolves (*Canis lupus*), and the endangered black-footed ferret (*Mustela nigripes*). Slender moonwort (*Botrychium lineare*), a candidate species for listing under the Act, and the greater sage-grouse (*Centrocercus urophasianus*), a species petitioned for listing under the Act, are also addressed in the DEIS.

The BHNF lies also within portions of Custer, Fall River, Pennington, Lawrence, and Meade Counties of South Dakota. The federally listed species that may occur in these counties and addressed in the DEIS are the bald eagle (*Haliaeetus leucocephalus*) and the black-footed ferret (*Mustela nigripes*). In 2003, the U.S. Fish and Wildlife Service (USFWS) was petitioned to list the Black Hills mountainsnail (*Oreohelix cooperi*) and the American dipper (*Cinclus mexicanus*), both of which are found in the BHNF.

Mr. Rick Cable, Regional Forester

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After reviewing the DEIS for the BHNF LRMP, Phase II Amendment, the Department is providing the following general comments regarding the conservation of selected species in Wyoming and South Dakota.

Bald Eagle. As stated in the Biological Assessment/Biological Evaluation (BA/BE) of the DEIS, bald eagles are present in the BHNF during winter, usually arriving in early November and leaving by March or April. There is no documentation of bald eagles nesting in the BHNF. However, in 2004, bald eagles constructed and tended a nest in the Norbeck Wildlife Preserve in Custer State Park, adjacent to the BHNF in South Dakota. As stated in the DEIS, bald eagles currently only use the BHNF for foraging during winter and seasonal migrations, and there are no anticipated changes in the DEIS that would affect foraging habitat for bald eagles. The DEIS cites BHNF Standards and Guidelines that will protect bald eagle nests should they occur in the BHNF. The Department supports the BHNF's efforts to establish effective conservation measures, through management standards and guidelines, to protect bald eagles foraging on the BHNF during winter and seasonal migration, as well as measures to protect traditional winter roost sites and nests. Although neither traditional winter roost sites nor nests have been documented on the BHNF, it is possible both may occur in the future due to the expanding population of bald eagles in Wyoming and South Dakota, and the presence of both roosting habitat and potentially suitable nesting habitat on the BHNF. The Department agrees that no construction should occur within one-quarter mile of any known active bald eagle nest, and any nests found should be reported to either the South Dakota or Wyoming U.S. Fish and Wildlife Service (USFWS) Field Offices depending upon where the sighting occurs.

Black-footed Ferret. Black-footed ferrets are dependent on prairie dog colonies, and as stated in the BA/BE for the DEIS, the BHNF has approximately 265 acres of occupied black-tailed prairie dog habitat in 5 colonies. A non-essential experimental population of black-footed ferrets was released into the eastern portion of Pennington County in 1996. The chance of dispersal from this population to the prairie dog colonies in the BHNF is highly unlikely; therefore, the occurrence of black-footed ferrets in the BHNF is not expected. Also, black-footed ferret surveys on prairie dog towns are no longer required as the BHNF has been "block cleared" due to the fact that no black-footed ferrets are believed to persist outside of reintroduced populations.

In 2003, the USFWS coordinated with the Wyoming Game and Fish Department in reviewing the current and historic status of prairie dog towns throughout Wyoming. Additionally, the USFWS reviewed the history of black-footed ferret surveys to determine whether the survey guidelines should continue to be applied across the entire state of Wyoming. Through this process, the USFWS determined that black-tailed prairie dog towns in Wyoming are not likely to be inhabited by black-footed ferrets. Therefore, take of individual ferrets and effects to a wild population are not an issue in black-tailed prairie dog towns in Wyoming, and surveys for ferrets are no longer recommended. The Department encourages BHNF to protect prairie dog towns for their value to the prairie ecosystem and the myriad species that rely on them. We further encourage you to analyze potentially disturbed prairie dog towns for their value to future black-footed ferret reintroduction.

Slender Moonwort. A population of *B. lineare* was discovered in the BHNF, in Crook County, Wyoming on June 19, 2003. The Black Hills population of slender moonwort is currently the

only one known in Wyoming. The species has been found in other western states in diverse habitat types in discontinuous populations, and the ecological requirements of this species are not well understood. There is much uncertainty regarding risks to *B. lineare*. Natural and human induced disturbances, including land management activities such as timber harvest, grazing, prescribed fire, and fire suppression may create and maintain suitable habitat for this species or may negatively impact existing populations, depending on the disturbance intensity and frequency (Beatty *et al.* 2003). The Department recognizes that, as stated in the BA/BE of the DEIS, regardless of the alternative selected, the BHNF is committed to monitoring the species according to current monitoring protocol (or as altered through reassessment with the Rocky Mountain Research Station), which is designed to detect and respond in a timely manner to changes in the extent and condition of the *B. lineare* occurrence.

Sage-grouse. Although conservation measures for sage-grouse are addressed in the Alternatives for the Phase II DEIS, elsewhere in the DEIS it is stated that habitat for sage-grouse does not occur on the BHNF. Due to the high profile nature of this species, the Department recommends that BHNF clarify the status of sage-grouse habitat on the BHNF and consider including a species description and effect analysis for sage-grouse, if habitat for sage-grouse is present and will potentially be affected by project actions.

Specific Comments

Page 2-36, Table 2-4, Designated Management Indicator Species by Alternative, and Pages C-22 through C-24, Section 4-0, Analysis of Effects, Bald Eagle: On Page 2-36 of the DEIS, it is stated that there is no roosting habitat for bald eagles on the BHNF. However, in the BA/BE of the DEIS, it is stated bald eagles are present in the BHNF during winter, usually arriving in early November and leaving by March or April. Additionally, on Page C-24, it is stated that indirect effects to bald eagle will be negligible because an adequate amount of roosting habitat will be maintained under all Alternatives. The Department recommends that the final EIS clearly identify whether there is roosting habitat for bald eagles on the BHNF, and document when and how surveys to determine the presence or absence of traditional winter roost sites on the BHNF have been conducted.

Page 2-36, Table 2-4, Designated Management Indicator Species by Alternative, and Pages C-22 through C-24, Section 4-0, Analysis of Effects, Bald Eagle: Again on Page 2-36, it is stated that there is no nesting habitat for bald eagles on the BHNF. However, the DEIS lists BHNF Standards and Guidelines that will protect bald eagle nests should they occur in the BHNF. This is confusing since if there is no nesting habitat for bald eagles on the BHNF, nesting should not be expected to occur. There is some indication that bald eagles may be expanding their breeding range in South Dakota, since in 2004, a pair of bald eagles attempted to nest near a reservoir adjacent to the BHNF, in an area never known to support nesting bald eagles before. So, although it is clear from the DEIS that there are no currently known bald eagle nests in the BHNF, the Department recommends that the final EIS identify the presence or absence of potentially suitable nesting habitat for bald eagles on the BHNF.

Page 2-47, Table 2-6, Comparison of How the Alternatives Respond to Key Phase II Decisions: It is stated that in Alternates 3, 4 and 6 that organochlorine pesticides will be prohibited in stands

used by bald eagles. Please clarify. Does this mean that organochlorine pesticides may be used in stands not occupied by bald eagles? If so, please identify how stand-use by bald eagles is defined and how surveys to determine stand-use will be conducted. Additionally, please identify which organochlorine pesticides or chlorinate hydrocarbons may be considered for use. Dicofol, chloroneb, chloroform are examples of organochlorines still on the market. Their persistence varies but most are moderately persistent to persistent. Since organochlorine pesticides may build up in a food chain, raptors such as bald eagles, on the top of the food chain, are vulnerable to receiving large doses. Exposure may occur even if eagles are not present when the pesticide is being applied.

Page 2-51, Table 2-6. Comparison of How the Alternatives Respond to Key Phase II Decisions, Page 3-32, Section 3-2.2. Grassland, Shrubland Ecosystems, and Page 3-213, Table 3-47, Species of Conservation Concern and Wyoming PIF Priority I Species List and Disposition: On Page 2-51, conservation measures for sage-grouse are addressed in Alternatives 3, 4 and 6. It is stated that in sagebrush within 3 miles of sage-grouse display grounds, the BHNF will manage for 15 to 25 percent cover. On page 3-32, it is stated that big sagebrush shrublands in the Black Hills are restricted to lower elevations of the western and southern flanks of the Hogback Rim, and on Page 3-213 it is stated that there is no habitat for sage-grouse on the BHNF. The Department recommends that these discrepancies be clarified and that the final EIS clearly document whether there are any know populations of sage-grouse or habitat for sage-grouse on the BHNF.

Page 2-51, Table 2-6, Comparison of How the Alternatives Respond to Phase II Decisions: Conservation measures for sage-grouse are addressed in Alternatives 3, 4 and 6. It is stated that in sagebrush within 3 miles of display grounds, the BHNF will manage for 15 to 25 percent cover. Please be aware that Connelly *et al.* (2000) advises that sage-grouse breeding habitat also support at least a 15 percent forb and grass canopy. A diversity of forbs is essential for hen nutrition prior to egg-laying, and to provide insects for newly hatched chicks. The U.S. Forest Service, the Bureau of Land Management and, the USFWS signed a Memorandum of Understanding with the Western Association of Fish and Wildlife (Western Association of Fish and Wildlife Agencies *et al.*, 2000) to consider the Western Association of Fish and Wildlife Agencies' guidelines for management of sage-grouse populations and habitats (Connelly *et al.* 2000) guidelines. The Department recommends that you follow these guidelines to promote sage-grouse conservation.

Page 3-33, Section 3.2.2, Shrubland Ecosystems and Page 3-65, Section 3-3, Emphasis Species: In the DEIS, in Section 3.2.2, it is stated that *emphasis* species that utilize shrublands in the Black Hills include sage-grouse. However, sage-grouse are not included as an *emphasis* species in Section 3-3. The Department recommends that the status of sage-grouse as an *emphasis* species in the BHNF be clarified in the final EIS.

Page C-15, Biological Assessment/Biological Evaluation, Section 3-1.4, Consultation History: It is stated that 3 additional species lists were received from the USFWS Wyoming Field Office. The references include "Long, 2003." Please note that this citation is not listed in the Reference Section 6-0 of the BA/BE.

Mr. Rick Cable, Regional Forester

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Page C-23, Biological Assessment/Biological Evaluation, Section 4-1.1, Bald Eagle: It is stated that all Alternatives have conservation measures to avoid adverse effects to bald eagles from overhead transmission lines. The Department recommends that conservation measures to help ensure that existing power lines are raptor-safe, be in accordance with guidelines in the *Suggested Practices for Raptor Protection on Power Lines. The State of the Art in 1996*, published by the Edison Electric Institute/Raptor Research Foundation.

Page C-25, Biological Assessment/Biological Evaluation, Section 4-1.2, Black-footed Ferret: It is stated that current USFWS guidelines "require that black-tailed prairie dog towns or complexes greater than 81 acres be surveyed for the presence of black-footed ferrets before determining effects on the species." Please be advised that black-tailed prairie dog towns in Wyoming were "block-cleared" in 2004, and the USFWS's Wyoming Ecological Services Office no longer recommends surveys for by black-footed ferrets in black-tailed prairie dog towns in Wyoming. Nonetheless, the Department encourages BHNF to protect prairie dog towns for their value to the prairie ecosystem and the myriad species that rely on them. We further encourage you to analyze potentially disturbed prairie dog towns for their value to future black-footed ferret reintroduction.

Page C-26, Section 4-1.3: Please note that the gray wolf has three distinct population segments - not four.

Page C-227, Biological Assessment/Biological Evaluation, Section 5.6.10, Northern Goshawk: Draft Alternative 1 provides no buffer for goshawk nests and Draft Alternative 2 provides for only a 0.25 mile buffer. The Department supports the BHNF management direction in Draft Alternatives 3, 4 and 6 that provides a 0.5 mile buffer around goshawk nests during the nesting season, and recommends that this Standard be incorporated into the final Phase II Amendment.

Page D-39, Table D-1, Standard 3103: Standard 3103 for Cooper's mountainsnail should be more specific in regard to protection of colonies. Maintenance of mesic site conditions and surface organic material is not adequate to address threats to colony extirpation from forest activities. Wording should be more specific to the continuance of the colony rather than just the site characteristics. Activities expected to have an adverse affect to colony persistence include grazing, prescribed burns, logging, off-road vehicle use, mechanical removal of vegetation, chemical treatment of noxious weeds, and spring/seep development. Recommendations for management of an Oreohelix species in the Wenatchee NF in Oregon suggests that colony sites should be protected from fire, but the surrounding area should be managed such that an intense fire would not destroy the colony (Burke 1999).

Page D-46, Table D-1, Code 3100-01 NEW, Standard: The Department supports the BHNF management direction in Alternatives 3, 4 and 6 to provide disturbance buffers around raptor nests. The disturbance activities addressed in this standard are "construction (e.g. roads, water impoundments, facilities), reclamation, gravel mining, oil and gas and water well drilling, timber harvest and fuel treatments, pre-commercial thinning and blasting." The Department recommends that the BHNF consider other activities that have the potential to disturb raptor nests and result in take under the MBTA. Such activities may include authorized recreational activities, firewood collection, and forest disease treatments.

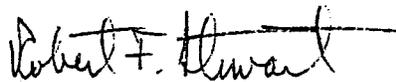
Mr. Rick Cable, Regional Forester

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Page D-41, Table D-1, Standard 3108a: Alternative 6 should include the use of alternative actions or timing for protecting nests found within 300 feet of structures in the wildland urban interface so that there would still be consistency with the fire emphasis but allow for some consideration for goshawk nests within these areas.

The Department appreciates the opportunity to comment on the DEIS for the Black Hills National Forest Land and Resource Management Plan, Phase II Amendment. If you have any questions or comments regarding this letter, or need further information for development of the BA, please contact Trish Sweanor in the USFWS Wyoming Field Office at (307) 772-2374, extension 39 or Sara Thompson in the USFWS South Dakota Field Office at (605) 224-8693, extension 25.

Sincerely,



Robert F. Stewart
Regional Environmental Officer

Literature Cited

Beatty, B.L., W.F. Jennings, and R.C. Rawlinson. 2003. *Botrychium ascendens* (trianglelobe moonwort), *B. crenulatum* (scalloped moonwort), and *B. lineare* (narrowleaf grapefern): A Technical Conservation Assessment. U.S.D.A. Forest Service, Rocky Mountain Region.

Connelly, J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. *Wildlife Society Bulletin* 28(4): 967 - 985.

Edison Electric Institute and the Raptor Research Foundation. 1996. *Suggested Practices for Raptor Protection on Power Lines - The State of the Art in 1996*. Washington, D.C.

Western Association of Fish and Wildlife Agencies, U.S.D.A. Forest Service, U.S.D.I. Bureau of Land Management, U.S.D.I. Fish and Wildlife Service. 2000. *Memorandum of Understanding for the Conservation and Management of Sage Grouse in North America*.

Reibold, Debra J.

From: Robert_F_Stewart@ios.doi.gov
Sent: Thursday, December 16, 2004 9:56 AM
To: bhmf-phase2@saic.com
Cc: hexton@fs.fed.us
Subject: Black Hills NF LRMP & DEIS - DOI Comments [Virus checked]



Black Hills NF Plan &
DEIS - D...

The Department of the Interior's comments on the subject document are attached.

If you require paper-copy or word-processor version, please so advise.

(See attached file: Black Hills NF Plan & DEIS - DOI Comments.pdf)

/signed/ Robert F. Stewart
Regional Environmental Officer
U.S. Department of the Interior
P.O. Box 25007 (D-108)
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01616



Pennington County

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Fax – (605) 394-6833

January 7, 2005

Comment Analysis Team
Black Hills National Forest
Phase II Amendment
PO Box 270990
Littleton, CO 80127-0017

Dear Comment Analysis Team:

As a county in western South Dakota that has 22% of its land mass in the Black Hills National Forest we, as the Pennington County Commission, feel we have a responsibility to our residents as well as the multitude of visitors to this part of the state each year to insure that the Black Hills National Forest is managed in the best way possible. Our county is greatly dependent upon the Forest for much of our economy including logging and tourism. Additionally we have a large part of population living within the boundaries or adjacent to the boundaries of the Forest, and the safety of those lives and property is of utmost importance.

With that in mind we strongly request additional logging and thinning of the forest. This promotes not only our timber economy, but also fights the insect infestation that is threatening to destroy large amounts of the forest if left unchecked. It is obvious that the forest is growing much faster than is being lost to harvesting and nature. The overabundance of trees creates a climate wherein insects and disease are much more of a danger, and are threatening the very existence of some areas of the forest. Also with additional residences in or in the approximate locale of the forest the danger of fire is increased dramatically. Additionally we request a greater emphasis on noxious weed spraying. If left unchecked noxious weeds soon take over vast areas in the forest and spread to adjacent private property creating an economic hardship on those residents. The county has experienced this on property adjacent to the federal grasslands, and we do not want a repeat performance of this.

We strongly encourage you to support the position of the South Dakota and Wyoming Cooperating Agencies with a special emphasis on the above. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "James Kjerstad". The signature is fluid and cursive, with the first name "James" being particularly prominent.

James Kjerstad
Chairperson

JK/rb



STATE OF SOUTH DAKOTA
M. MICHAEL ROUNDS, GOVERNOR

January 5, 2005

Comment Analysis Team
Black Hills National Forest
Phase II Amendment
P.O. Box 270990
Littleton, CO 80127-0017

Subject: Comments on the BHNF Phase II DEIS.

Dear Comment Analysis Team:

The states of Wyoming and South Dakota, along with the undersigned cooperating agencies, appreciate the opportunity to submit our comments on the Draft Environmental Impact Statement (DEIS) for the Black Hills National Forest Land and Resource Management Plan.

This document represents close work among the states, their natural resource agencies and several local governments. While you will be receiving information separately from each cooperating agency, additional face-to-face discussions would be useful to help resolve resource conflicts before the final plan and EIS are released. Cooperators have repeatedly discussed these conflicts, and we believe opportunities exist to develop a final plan that resolves them.

Put simply, we would suggest that the U.S. Forest Service create a new alternative which encompasses adequate fire protection measures, improves vegetative diversity and addresses the insect problem inherent in the Black Hills National Forest (BHNF). Enclosed please find comments and recommendations for improving forest health and biological diversity.

Of the alternatives presented, Alternative 6 is the only one that begins to address the dangerous fire conditions in the Black Hills. Its urban interface work and fire protection measures to protect lives and property are encouraging, and it can provide the minimum needed to protect our Communities at Risk (CARs) and areas of Wildland Urban Interface (WUIs). However, we cannot condone ignoring the balance of the forest while protecting our CAR and WUI areas. Alternative 6 is not the end of the story and should be supplemented with vegetative diversity management in the interior areas of the forest.

None of the alternatives presented adequately address the insect problem on the forest or the fact that insect-killed trees will continue to create significant fire hazards. In fact, the fire record of the BHNF since 1999 is already of historic proportion. The alternatives largely ignore the catastrophic size, nature and long-term consequences of the insect problem, which truly translates to an overall forest health problem.

In simplest terms, there are too many ponderosa pine trees on the BHNF. None of the alternatives adequately address the fact that the forest is already outpacing the combined impacts of natural mortality and human management by 100 million board feet. The forest is overstocked with pine trees in the small-to-medium size range (many between 90 and 120 years old)—often described as the “wall of wood.” This overstocked condition can be treated by increasing the vegetative and structural diversity of the BHNF. By diversifying species of vegetation and size classes among those species, forest health is improved as well as the viability of many species of plants and animals.

We support the effort to increase treatment of noxious weed-infested areas as described in Alternative 6, but also believe these should be new acres in addition to the continued maintenance of previously treated areas. The BHNF should prioritize treating infested areas close to property boundaries and waterways and work cooperatively with adjacent property owners and county weed control programs to treat cross-boundary infestations.

Other concerns include the proposed Research Natural Area (RNA) designations and the Structural Stage classification contained in the document. The current Structural Stage classification is insufficient for correctly managing for the habitat needs of species that depend on large trees. It would seem that a new structural stage is in order, one that would identify stands with larger-diameter class trees that would be more suitable for addressing viability needs.

We do not support RNA designation of Geis Springs, Cranberry Springs, Upper Sand Creek, Sheep Nose Mountain, Canyon City, Fanny Boles and Lemming Draw, but are neutral on RNA designation of Iron Mountain North and North Fork Castle Creek.

Significant efforts must be made to protect people and property and to create a diverse landscape that will assure viability to a diversity of species. Meeting these challenges will be no small task, as expansions in funding, acres treated and the use of alternative methods—such as stewardship contracting—will be required. We look forward to continuing to work with you to improve our forest.

Our respective agencies have prepared a report, which is enclosed, describing their concerns and suggestions in greater detail. It would also benefit all involved if the Forest Service were to engage all cooperators in additional dialogue between the draft and final EIS stages. While agreeing with this summary and the enclosed document, the undersigned cooperating agencies reserve the right to submit additional comments reflecting concerns specific to their jurisdictions.