

Appendix C
Comment Analysis
KRAFT SPRINGS PROJECT
PUBLIC SCOPING AND RESPONSE TO COMMENTS

**COMMENT ANALYSIS
KRAFT SPRINGS PROJECT
PUBLIC SCOPING AND RESPONSE TO COMMENTS**

Table 1: Comments received in response to initial public scoping letter dated October 29, 2002

NAME	Ltr.	COMMENTS	RESPONSE
Jim Hoxie, Pope and Talbot Inc. SpearFish SD	1	a. Supports Salvage Efforts b. Requests consideration of salvaging larger top size and dbh size.	b. There is no restriction on tree size for salvage.
Carter County Commissioners, MT	2	a. Requested cattle guard replacement on Speelmon Rd. b. If roads are closed to public, have system to allow permittees, contractors, and administrative use. c. Concern expressed on tree planting on grass sites, impacts on grazing livestock. d. Glad to see road improvement being proposed.	a. Cattle guard would be replaced if damaged by fire or suppression activities. b. In event of road closure, a system would be used to allow access by permittees, contractors, and for administrative use. c. Tree planting would occur in areas with reasonable probability of natural regeneration. Planting density is planned to allow a long-term low density of new trees in MA B (Livestock Grazing) This concern was addressed in Ch 1 of the EA as Issue #8 and discussed in the silviculture section in Chapter 3 and the range section in Chapter 3.
Robert Young Ekalaka, MT.	3	a. Supports salvage logging before economic value lost.	Thank you for your comments.
Mary Tarter Camp Crook, SD	4	a. Supports salvage logging to reduce fire hazard in future b. Would like to see roads kept open to remote areas for fire access. c. Controlling noxious weeds is a priority	b. Roads would be open to administrative use for fire suppression. Road decommissioning of unneeded roads may be proposed at a later time, and if so, public comments would be solicited for that proposal. c. Noxious weeds are identified as an Issue # 4 in Ch.1; in addition Project Design Features and Monitoring address noxious weeds in Ch. 2. In addition, noxious weeds are discussed in the Range/Noxious weed section in Ch. 3.
USDI, BIA Billings, MT.	5	a. Supports salvage logging to recover economic value	Thanks you for your comments.
Tom Troxel, Intermountain Forest Association. Rapid City, SD.	6	a. Supports salvage of dead trees. b. Supports project objectives of reducing fuels and capturing economic value of dead timber. c. Concern is that process is not moving fast enough before value of trees are lost to age and insects. Suggests that salvage operations need to occur by Spring 2003.	c. The analysis is being completed by April 30, 2003. If there are no appeals, the salvage activities could start by May 2003.
Harriet Speelmon Ekalaka, MT.	7	a. Supports salvage, concern over noxious weeds, be sure to plant native grasses.	a. Salvage would occur with Alt 2, noxious weeds are address in Ch 1 as Issue #4 and project design feature would implement procedures to inventory, control and monitor noxious weeds. An approved grass seed mix would be used were needed on project temporary road and skid trails.

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NAME	Ltr.	COMMENTS	RESPONSE
David Rutledge Billings, MT	8	<ul style="list-style-type: none"> a. Supports project restoration and fuel reduction activities. b. Requests that the Ekalaka Hills be a primary area for the Custer NF to implement pro-active fuels reduction treatments. The individual has property in the Ekalaka Hills and notes forest conditions are high risk to fire. 	<ul style="list-style-type: none"> b. The Custer NF-Sioux Ranger District is considering a new NEPA project and a treatment proposal for the Ekalaka Hills to reduce fire hazard conditions and maintain forest stands. Depending on funding from Congress, the NEPA process could start next year.
Shelly Diesh, SD Dept. of Game, Fish and Parks. Rapid City, SD.	9a,b	<ul style="list-style-type: none"> a. Concern over snag retention and recommend leaving large merchantable and unmerchantable snags for snag-dependent species. b. Consider retention and distribution of CWD in treatment units. c. Live trees should not be cut by commercial harvest. Live hardwoods should not be cut. d. Effects of livestock grazing and wildlife ungulate use on hardwood draws burned in fire. Suggests restrictions on livestock use in short-term and possible hardwood draw protection by jackstrawing dead timber or fencing. Inquires if monitoring would be done for watershed and riparian damage by livestock. Asks if destroyed water developments would be moved out of draws, riparian areas. e. Concern over aggressive hazard tree removal would create wide swaths and create wildlife habitat fragmentation and adverse effects to scenic values. f. Travel Management: recommends no new road, minimal maintenance standards and road obliteration or closure of user-created roads. g. What is proposed seed mix to reseed temporary roads, skid trails, and stabilize soils. h. Are cave/ abandoned mine resources protected. These need to be inventoried for bat habitat and presence. i. Are R1 Sensitive plants and wildlife species considered? 	<ul style="list-style-type: none"> a. Snags > 11 " diameter would be left (2-6 / acre) in all treated areas. In addition all nonmerchantable snags would be left in commercial salvage units. Snag management for wildlife species is addressed as Issue #2 in Ch. 1. Ch. 2 has project design features #9 and #10 that specifically address snag retention in the project area. In addition, the noncommercial-delayed units were proposed to provide wildlife cover and snag patches in the short-term. b. CWD is addressed as Issue # 5 Soil Productivity. Project Design Features in Ch 2 note desired retention of CWD of 10-15 tons/acre on all areas. c. Live trees (defined as 50% green crown) would not be salvage by commercial units. No cutting of live hardwoods is proposed. d. Protection of woody draws is noted as Issue # 7 in Ch. 1. The project has no specific treatments proposed for woody draws, however, when available, dead trees would be jackstrawed along edges of burned woody draws to restrict livestock use. Monitoring would occur and if resource damage is affecting woody draws, additional protection measures would be considered, including grazing restriction and fencing. Destroyed water developments would be assessed to determine if they can be moved out of a sensitive riparian area or woody draws. That monitoring would occur from the BAER activities recommendations. e. Hazard tree removal would only occur in treatment units to protect logging operations and individuals from hazards. No wide swaths are proposed along existing roads, and snag retention guidelines are described in the wildlife project design features in Ch. 2. f. No new specified roads are proposed. 20 miles of temporary roads would be used to implement Alt. 2, however they would be decommissioned after use. Additional road decommissioning is being studied and may be proposed in a future NEPA document. Roads that are closed after use would be restricted and enforcement measures would be implemented. g. An approved seed mix would be used to revegetate temporary roads, and skid trails. No widespread seeding in other areas is proposed for treatment areas. h. No known caves or mines would be affected by the project activities. i. R1 Sensitive plants are addressed in the Rare Plants section in Ch. 3. Wildlife sensitive species are addressed in the Wildlife Section in Ch. 3, and in addition, a complete wildlife report and a BA for Listed species is in the project record.

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NAME	Ltr.	COMMENTS	RESPONSE
Lloyd Carroll Ekalaka, MT.	10	a. Supports the project activities for Kraft Springs. b. Requests a similar project for the Ekalaka Hills Land Unit to reduce fire danger.	b. The Custer NF-Sioux Ranger District is considering a new NEPA project and a treatment proposal for the Ekalaka Hills to reduce fire hazard conditions and maintain forest stands. Depending on funding from Congress, the NEPA process could start next year.
Brad Schultz South Dakota Dept. of Environment and Natural Resources. Pierre, SD.	11	a. Comments on air quality and notes that the Kraft Springs project would not have an impact on the air quality of SD. b. Notes that dust and burning of tree and brush piles should be managed so emissions do not cause air quality problems to adjacent people.	a. The Kraft Springs project would not have impact on air quality for SD. b. Burning of tree and brush piles would be completed with an approved burn plan and would be limited to reduce any air quality impacts to adjacent people.
Alvena Varner Baker, MT.	12	a. Expressed concern that the Kraft Springs fire should have been suppressed sooner and feels that the FS was directly responsible for the resource and monetary damage to the area and to private ranchers.	a. The Kraft Springs Fire was the result of numerous lightning strikes over a short time period. Available resources were used to control those fires as best as possible under the circumstances. Charges of negligence by the FS in suppression activities on the Kraft Springs Fire are outside the scope of this analysis.
Dennis Grove Elkridge, Maryland	13	a. Expressed concern over hunting access in Long Pines due to road closures. Wants the Foster Road kept open for future hunting access.	a. Road closures are determined by the need to balance access and protect wildlife resource and also to eliminate any un-needed roads in the Long Pines Area. Any future road decommissioned proposals would require a NEPA analysis and the public would be invited to express their need and concerns for road management in the Long Pines Land Unit. The Foster road access is not determined at this time.
Chad Hoherz Camp Crook, SD	14	a. Expresses support for project treatments.	Thank you for your comments.
John Kerr Capitol, MT.	15	a. Suggests fewer trees should be planted to allow more grazing by livestock.	a. Determination of final locations for planting will depend on several factors: (1). Burn intensity, (2). Lack of adequate ponderosa pine seed source, and (3). Aspect. In addition, forage production and wildlife needs will be taken into consideration to determine the spacing between planted trees.
Gordon Helms Reva, SD	16	a. Expresses concern over tree planting and effects on livestock grazing. Why are we planting trees in areas where a natural event (wildfire) removed all trees? b. Suggests that the FS people get a book on common sense and read it.	a. See the response to comment 15. b. 36 CFR 219.28 requires the Forest Service to adequately restock suitable lands within five years after harvest. Salvage operations are considered a final harvest and require reforestation of suitable lands.

Table 2: Comments received in response to public comment period for the EA (February 14, 2003 to March 17, 2003).

NAME	Ltr.	COMMENTS	RESPONSE
Harding County Commissioners, SD	1	Expressed support for the project, Alternative #2.	Thank you for your comments and support.
Tom Troxel, Intermountain Forest Association. Rapid City, SD.	2	Expressed support for the project and Alternative #2. Additional comments regarded two items in the proposed action Project Design Feature Table.	Thank you for your comments and support. Items noted in the Project Design Feature Table will be considered.
Jim Hoxie Pope & Talbot, Inc. Spearfish, SD	3	Expressed support for the project and Alternative #3.	Thank you for your comments and support.
Mrs. Patty Hendricks Ekalaka, MT	4	Expressed support, and additional comments on planting trees, use of logging, and firewood access.	Thank you for your comments and support.
Mr. Clarence Kreager Baker, MT	5	Oral Comments, expressed support for the project,	Thank you for your comments and support.
Mr. Robert Mies Ekalaka, MT	6	Oral Comments, requested copy of EA	Thank you for your comments and support.
<i>The Ecology Center Missoula, MT</i>	7	<i>See Table 2a for Ecology Center Comments</i>	

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#1, item 1	EA ignores scientific evidence on effects of post-fire salvage logging	Effects of post-fire salvage logging are the primary focus on the EA, and those potential effects are discussed in detail in the Fire/Fuels section, Watershed/Soils section, and Appendix B-3. Project Design Features include BMPs and other measures to reduce impacts. No significant impacts are noted.
#1, item 2	EA fails to show that BMPs are effective to limit erosion and effects to water quality	BMPs are the result of many projects and many agencies experiences, including Federal and State agencies. They are called Best Management Practices as they have been shown to be effective to reduce effects. Project Design Features include BMPs and other measures to reduce impacts. No significant impacts are notes.
#1, item 3	Range of Alternatives is inadequate	The EA has a reasonable range of alternative presented in Chapter 2, including the No Action, Proposed Action, and Alternative 3. In addition, another alternative was considered but not studied in detail. The range of alternatives is determined by the issues considered, and Alternative 3 (Noncommercial treatments Only) was developed to address one key issue (effects of commercial logging)
#1, item 4	EA fails to analyze the impacts of 20.5 miles of temporary roads.	The impact of temporary roads and impacts on soils/watershed and wildlife are addressed in those sections. The Project Design Features include BMPs and other measures to reduce impacts of temporary roads. No significant impacts are noted.
#1, item 5	EA fails to analyze the impacts on forest fragmentation from the large openings.	The large openings in vegetation were created as a result of the Kraft Springs Fire. Forest fragmentation and effects of large openings are discussed in the Forest Vegetation section and the Wildlife section. No significant impacts are noted.
#1, item 6	EA fails to analyze the potential soil detriment associated with salvage logging	The impacts on soils and long-term soil productivity are discussed in detail in Chapter 3, Watershed/Soils section, Forest Vegetation Section, and in Appendix B-3, Responses to Beschta Report. No significant impacts are noted.
#2	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#3	Kraft Springs Fire represents changed conditions that requires the Custer National Forest Plan to be amended or revised	Outside the scope of the KS EA.
#4	Have ongoing activities have been stopped due to KS fire and possible effects	Kraft Springs BAER report made recommendations for short-term and long-term rehabilitation needs for the Long Pines land units. No logging or mineral activities are occurring in the Long Pines. In addition, grazing activities are being curtailed in the Long Pines area affected by the Kraft Springs Fire for the next two years.

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#5	An EIS is required due to scale of activities in KS EA	When an EA has been prepared, the responsible official shall review the document and determine whether the proposed action may have significant effect on the quality of the human environment. The CEQ Regulations define a finding of no significant impact (FONSI) as: <i>...a document by a Federal agency briefly presenting the reasons why an action, not otherwise excluded (1508.4), will not have a significant effect on the human environment and for which an EIS therefore will not be prepared. It shall include the EA or a summary of it and shall note any other environmental documents related to it (1501.7(a)(5)). If the assessment is included, the finding need not repeat any of the discussion in the assessment but may incorporate it by reference (40 CFR 1508.13).</i> The decision notice and FONSI for Kraft Springs project provides the rationale for the completion of the EA or EIS.
#6	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#7	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#8	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#9	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#10	Requested info on firelines and fire suppression	Outside the scope of KS EA. KS BAER report discusses effects of fire and firelines. Rehabilitation work was completed in the fall of 2002 after the Kraft Springs Fire was suppressed. The location of firelines can be found in the fire records for the Kraft Springs Fire.
#11	<ol style="list-style-type: none"> 1. Range of Alternative is not adequate 2. A no road construction Alternative should be considered 3. A prescribed fire only alternative should be considered 	<ol style="list-style-type: none"> 1. Range of alternatives; see response to #1, item 3. 2. Alternative 1 and Alternative 3 have no road construction. 3. An alternative using only prescribed fire was considered but not studied in detail, see Ch 2, spec 2.3
#12	No coherent purpose and need stated	Purpose and Need is precisely described in Ch 1, section 1.3
#13	EA should address impacts of all road construction	Road construction impacts are discussed in the Watershed/Soils section, Wildlife Section, Noxious weed section, and the Transportation section. No significant impacts are noted.
#14	Oppose any new roads and roads in any roadless areas.	No new specified roads are proposed for any alternative, temp roads are not new specified road construction. The project area has no inventoried roadless areas, uninventoried roadless areas, and unroaded areas. In addition, the project is not adjacent to any roadless, wildlerness, or wilderness study areas, or undeveloped sections of Parks lands.
#15	EA should consider the post-fire stability of roads in project area	The KS BAER report considered roads, and a complete roads analysis was completed for the Long Pines Land Unit. Road decommissioning and closure may be proposed by a future NEPA document.
#16	A roads analysis needs to be conducted	See response to #15
#17	Unclassified road should be addressed and removed or improved	The roads analysis completed recently may lead to a future NEPA analysis to close or upgrade unclassified roads.

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Letter Paragraph number	COMMENTS	RESPONSE
#18	Impacts of 20.5 miles of temporary roads are not adequately analyzed	See response to #1, item 4. No significant impacts are disclosed in the EA.
#19	<ol style="list-style-type: none"> 1. What are the impacts of roads on wildlife, native plants, soils, watersheds, water, aquatic sp, recreation, scenic, archeology, forests, vegetation and other resources? 2. IS there an up to date inventory of the roads? 	<ol style="list-style-type: none"> 1. This comment did not identify a site-specific issue or concern for the Kraft Springs project. See response to #1, item 4. No significant impacts are disclosed in the EA. 2. See response to #15
#20	EA must clearly discuss how fire damaged trees will be delineated.	The process for determining fire-killed and dying trees is discussed in the EA chapter 2, section 2.4.2.1. Trees with a green crown of 50% or more would be left standing, however, if beetle activity is noted, trees with 50% green may be salvaged (USDA Forest Service. October 2000. Survivability and Deterioration of Fire-Injured Trees in the Northern Rocky Mountains. Report 2000-13).
#21	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#22	Who will be selecting dead and dying trees for salvage?	Forest Service timber management personnel will be determining dead and dying trees.
#23	<ol style="list-style-type: none"> 1. Request a careful analysis to fish and water quality 2. Disclose locations of seeps, springs, bogs and sensitive wet areas, and effect on those resources. 3. Refrain from harvesting in riparian areas. 	<ol style="list-style-type: none"> 1. The comment concerning fisheries and fisheries habitat are outside the scope of this document. No fish bearing streams exist in the Long Pines Land Unit. A comprehensive watershed resource analysis was completed for the EA. 2. Known sensitive wet areas were addressed during the analysis. The watershed section in the EA notes impacts on water resources. 3. Riparian areas will have a buffer zone.
#24	Disclose results of monitoring for fish habitat and watershed conditions	The comment concerning fisheries and fisheries habitat are outside the scope of this document. No fish bearing streams exist in the Long Pines Land Unit. The Watershed/Soils section in Ch 3 describes fish and watershed conditions and any available monitoring information.
#25	<ol style="list-style-type: none"> 1. Make sure that beneficial use of water will not be degraded 2. What is the effectiveness of BMPs? 3. Need a discussion of BMPs and mitigation measures 	<ol style="list-style-type: none"> 1. No impact will occur on beneficial use of water (see Watershed/Soils section) 2. BMPs if used correctly and implemented are considered effective. 3. BMPs for resource areas are noted in Chapter 2, and discussed in the specific resource analysis section.
#26	Disclose area of unstable soils.	Unstable soils are discussed in the Watershed/Soils section in Ch. 3.
#27	Effect on Aquatic species, and habitat features	No perennial streams are present in activity areas, and no aquatic fish species or habitat would be impacted. Impacts on water and other aquatic species are discussed in the Watershed/Soils and Wildlife sections in the EA.
#28	Effects of salvage logging on overland water flow, sediment, erosion and soil compaction need to be addressed.	Effects on soil, water, sediment, and erosion are discussed in the Watershed/Soils section and Appendix B-3. No significant impacts are noted.
#29	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#30	Effects on aquatic species and MIS downstream.	See response to # 27
#31	Similar comments as # 25 and #28 above	See responses to # 25, #28

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#32	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#33	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#34	The EA notes a soil disturbance standard of <15%, however there is no such standard in the Forest Plan.	This section is in error and will be corrected to reflect Forest Service Manual policy. The standard to not exceed soil disturbance of 15% is A USFS Region 1 Standard (FSM 2554, R1 Supplement 2500-99-1).
#35	EA is not in compliance with the 15% standard.	The Watershed/Soils section notes that the project is in compliance with the 15% standard.
#36	Has soil compaction been analyzed? Is there a qualified soils scientist on IDT	Soil compaction is discussed in the Watershed/Soils section. The IDT has a qualified Hydrologist that is qualified to analyze soil and watershed conditions and impacts. In addition, the Forest Soil Specialist provided technical advice, coordination and review.
#37	Similar comments as #36	See response to #36
#38	EA must consider cumulative effects on soils	Cumulative effects on soils are discussed in Watershed/Soils section.
#39	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#40	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#41	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#42	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#43	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#44	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#45	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#46	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#47	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#48	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#49	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project. Seems to refer to another NEPA project?
#50	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#51	EA must specify amounts of CWD remaining.	CWD requirements are discussed at numerous places in the EA. CWD is one of the project tracking issues. See Chapter 1, section 1.7.1.6
#52	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#53	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#54	Concern over litter, duff, Humus and other soil factors	Soils and the attributes of the soil resource are discussed in the Watershed/Soils section and Appendix B-3. No significant impacts are noted.
#55	Similar comments to #54	See response to #54
#56	Similar comments to #54	See response to #54
#57	Similar comments to #54	See response to #54. Also, forest diseases are discussed in the Forest Vegetation section.

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#58	Similar comments to #54	See response to #54
#59	<i>(Editorial comments, non specific)</i>	No specific concerns for KS analysis noted.
#60	<i>(Editorial comments, non specific)</i>	No specific concerns for KS analysis noted.
#61	EA has no analysis for lichens, fungi, and insects.	The project soils analysis is done to reduce any significant impacts to soils over the project area, and those indicators of soil health (lichens, fungi, insects) would also have the impact limited by the use of soil protection measures as noted in the Project Design Features.
#62	Similar comment as # 34 and #35 regarding 15% soil disturbance standard	See responses to # 34, #34
#63	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#64	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#65	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#66	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#67	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#68	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#69	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project. Seems to be referring to another NEPA project?
#70	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#71	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#72	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#73	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#74	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#75	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#76	The project does not protect the WUI	Fuels reductions would occur adjacent to the WUI identified in the KS area, and analysis in the Fire/Fuels section notes that the fire hazard to the WUI area would be reduced.
#77	Why is there a risk from wildfire to adjacent property outside of the FS isolated forest Island?	The Kraft Springs wildfire started on the Long Pines Land Unit and moved east off the forest island and threatened and damaged private lands and property. The Kraft Springs Fire burned approximately 24,000 acres of private land. The vast majority of this was private land outside the forest boundary. The effects from the fire is documented in the Kraft Springs Fire Burned Area Emergency Rehabilitation Report dated September 2002 and Kraft Springs Fire Recovery Emergency Situation Documentation completed in March 2003 and signed by Nancy Curriden. Both of these documents provide additional information on the risk and damage to private property adjacent to National Forest System lands because of the Kraft Springs Fire.

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#78	The analysis should consider how livestock grazing has caused the situation of too many trees needing treatment.	The proposed treatments are to salvage dead trees and reduce long-term fuels from the dead trees falling to the ground. The livestock concern is outside the scope of this document since the project is to reduce hazardous fuels created by the Kraft Springs Fire.
#79	The Custer NF must amend the Forest Plan to change the fire suppression guidelines if fire suppression is noted as a problem.	<p>The Forest has an overall fire management plan in which all areas of fire management (prevention, pre-suppression, suppression, prescribed fire, fuels management, residue treatment, etc.) are addressed and in compliance with the current Forest Plan (USFS, Oct. 1986) as well as most of the elements of the Federal Wildland Fire Policy (USDA and USDI, Dec. 1995) and Federal Wildland Management and Program Review (USDA and USDI, May 1996).</p> <p>Amending the Forest Plan to abide by the new Fire Policy is beyond the scope of the decision to be made in this analysis.</p>
#80	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#81	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#82	Request the definition of the WUI	The WUI is defined in the analysis as that area adjacent to occupied home and property.
#82a	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#82b	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#82c	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#83	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#84	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#84a	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#85	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#86	Request description of size, distribution, and species of trees to be salvaged.	Information on trees to be harvested is found in Chapter 1, 2, and the Forest Vegetation section in Chapter 3. Also in Appendix B-2 Vegetation Cover Types.
#87	What factors contributed to the Kraft Springs Fire and the Brewer Fire? Did grazing, logging, roads, have an impact.	Both fires were started by lightening, and spread due to dense forest conditions, heavy fuel loads, high wind conditions, and high temperatures. Additional information on factors that contributed to the Kraft Springs Fire is contained under the following documents: "Observed Fire Behavior and Fire Effects on the Kraft Springs Fire" completed by Allen Rowley, Fire Behavior Analyst on September 19, 2002 and Kraft Springs Fire Recovery Emergency Situation Documentation completed in March 2003 and signed by Nancy Curriden.
#88	How is the area at risk for a reburn, what fuel exists now.	The analysis for the risk of fire is discussed in Ch 1, and the Fire/Fuels section in Ch. 3. Short-term and long-term fuel hazards are discussed
#89	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#90	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.

Table 2a: The Ecology Center Letter of March 17, 2003, comments in response to scoping letter (Feb. 14, 2003).

Letter Paragraph number	COMMENTS	RESPONSE
#91	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#92	Recommend that a Restoration Alternative be developed	Both the proposed action and alternative #3 are fire hazard abatement and restoration alternatives.
#93	EA does not ensure that artificial planting does not inhibit natural regeneration.	Artificial planting units were selection based on the District silvicultural input and included those units that no local seed source existed for revegetation.
#94	Similar comment to #93 above	See response to # 93
#95	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#96	<ol style="list-style-type: none"> 1. EA fails to address fragmentation 2. EA fails to address impacts of 20.5 miles of temporary roads on fragmentation.. 	<ol style="list-style-type: none"> 1. See response to #1, item 5. 2. See response to # 1, item 4
#97	Request comprehensive analysis on MIS species	MIS, TES, and other wildlife issues are addressed in detail in the Wildlife Section, Ch. 3. No significant impacts are noted.
#98	<i>(Similar comments to #97)</i>	See response #97
#99	EA needs to address impacts on ungulates, hunters, wildlife habitat, and ESA listed species.	See response #97
#100	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#101	The EA fails to adequately analyze the effects of salvage logging on Wildlife	See response to #97
#102	EA does not address effects on foraging habitat for wildlife	See response to #97. No significant impacts to foraging habitat are noted.
#103	BMP are not adequate to protect leopard frog and other aquatic species.	See response to #97. No significant impacts to leopard frog or other riparian species are noted.
#104	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#104a	Has Custer NF surveyed for songbirds in project area?	See response to #97
#104b	How would the project impact old growth, aspen, riparian and hardwood draws MIS species?	See response to #97
#104c	How will the project impact winter habitat of elk, antelope and other wildlife species?	See response to #97
#105, Items 1-5	What are the effects on TES species?	The effects on Wildlife TES are noted in the Wildlife Section and the Wildlife BA/BE. Effects on Sensitive plants are noted in the Rare Plants section and the Sensitive Plants BE.
#106	Surveys for TES and MIS species must be completed.	Needed surveys were accomplished for TES species. See the Wildlife Section and the Rare Plants Section.
#107	The FS does not demonstrate how it will ensure the viability of the Black-backed woodpecker in project	Impacts on Black backed woodpeckers are disclosed in the Wildlife section and in the Wildlife BE/BA. The determination was MIIH, with High Persistence, with a potential declining trend.
#108	Similar comments to #107 above	See response # 107

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Letter Paragraph number	COMMENTS	RESPONSE
#109	Effects of removing dead trees and impacts on Black-backed woodpecker	See response #107. In addition, snag retention measures are noted in the Project Design Features.
#110	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#111	Concern over northern leopard frog and riparian systems.	The impacts on Northern leopard frog are disclosed in the Wildlife Section and the Wildlife BE/BA. The determination of No Impact was given.
#112	How is the viability for Goshawk ensured?	The impacts on Northern Goshawk are disclosed in the Wildlife Section and the Wildlife BE/BA. The determination of MIIH was given, low persistence, static trend. In addition, focused goshawk surveys were accomplished and no active goshawk nests were found.
#113	Similar comment as # 105	See response to #105
#114	Possible effects of noxious weeds on rare plants	Noxious weeds are discussed in the Range section. Rare plants are discussed in the Rare plants section and in the plants BE. No impacts from noxious weeds are noted.
#115	Concern over manmade openings and consequential blow-down of remaining trees.	Opening created by the wildfire and the impacts on the remaining forests are noted in the Forest vegetation section.
#116	Concern over regeneration success	Forest regeneration is discussed in the Forest Vegetation section.
#117	Similar comments to # 116	See response to #116
#118	Request a discussion of BMP's	BMPs are noted in the Project Design Feature Table in Chapter 2. The individual resource areas discuss resource specific BMPs and the purpose of each BMP.
#119	Request a cumulative effect discussion	Cumulative effects are discussed for each resource area, and a list of activities considered is in Chapter 3, Section 3.13. In addition, large scale maps of past, present and future activities are in the project files.
#120	Similar comment to #119	See response to #119
#121	Similar comment to #119	See response to #119
#122	Concern over cultural resources and needed surveys	Cultural resource surveys were accomplished, and the effects on cultural resources are discussed in the Cultural Resources section of Chapter 3.
#123	Effects on the recreational resource,	Impacts on the Recreational resource are discussed in the Recreation Section in Ch. 3. No significant impacts are noted.
#124	Concern over logging Old growth	There was no Old Growth identified in the Project area prior to the fire, and any salvage of timber in fire-killed stands would not affect any green forest stands.
#125	Similar comment to #124	See response to #124
#126	Similar comment to #124	See response to #124
#127	Request documentation for economics and net public benefit costs and expenses	Economics are discussed in detail in the Economics section of Ch. 3. The economic analysis was prepared in accordance with direction in Forest Service manuals and handbooks (FSM 1970, FSH 1909.17 and FSH 2409.18). Only quantifiable benefits are discussed in the economic analysis. Unquantifiable benefits (effects) are discussed in other portions of the document.

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Letter Paragraph number	COMMENTS	RESPONSE
#128	Similar comment to #127	See response to #127
#129	Similar comment subject as #127	See response to #127
#130	No specific comments	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#131	Request list of all past projects and monitoring results	Past projects are noted in the project files, and in the Cumulative Activities section of the EA. If monitoring was accomplished for past projects, the monitoring results are in the project files for those projects. Monitoring results are also included in the monitoring report for the Custer National Forest LRMP.
#132	<i>(Editorial comments, non specific)</i>	This comment did not identify a site-specific issue or concern for the Kraft Springs project.
#133	Concern over spread of noxious weeds and effects on species of concern	Noxious weeds are discussed in the Range section in Ch. 3. In addition, noxious weeds are a tracking issue in Ch 1, and Ch 2. No impact to sensitive species from noxious weeds are noted in the Sensitive plant BE.
#134	Similar comment subject as # 133	See response to #133
#135	Concern over validation of the Management Areas in project	Outside the scope of the KS EA
#136	Concern over historic condition of forest in project and the information used to determine unnatural fuels levels.	Fuels, fire regime, and the forest ecology are discussed in Ch 1, and in Ch 3, Fire/Fuels section, and the Forest Vegetation section.
#137	Please consider noncommercial alternatives	Alternative #3 is a noncommercial alternative studied in detail. This was in response to Issue #1.
#138	Comments regarding HRV and the scientific debate over that concept and the usefulness to management.	Thank you for your comments.
#139	(Comments unclear)	Comments are outside the scope of this document since an environmental assessment along with a decision notice will be completed for the Kraft Springs project and not a CE. Comments #139-146 seem to be an mistaken addition to the comment letter for Kraft Springs project. These comments seem to be for some other project, unrelated to Kraft Springs.
#140	(Comments unclear)	See response #139
#141	(Comments unclear)	See response #139
#142	(Comments unclear)	See response #139
#143	(Comments unclear)	See response #139
#144	(Comments unclear)	See response #139
#145	(Comments unclear)	See response #139
#146	(Comments unclear)	See response #139