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April 7, 2023

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<https://www.fs.usda.gov/project/?project=61689>
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=61689>

Re: Chimera Fuels Reduction Project EA

We don't like either alternative but C is better than B.

Small trees

We remained concerned by the amount of small tree regeneration on the forest and that you need to be cutting out the small "baby" trees in the undergrowth, not the few remaining large older ones. We believe old trees with thick yellow bark are fire resistant. Small trees place fine fuels (their needles) next to flammable litter on the ground. The major fire risk now is in the undergrowth.

Please evaluate the area for all the small trees and the need to thin those with a precommercial thin. We believe the IRA money can be spent to thin small trees. Please disclose the inventory of the acres of small tree clogging up the undergrowth & please plan to thin those in pre-commercial thins.

Unsustainable Cut

The General Technical Report 422 of April 2021 identified the extreme overlogging of the Black Hills National Forest that is currently ongoing. It had the highest level of ASQ possible “in the best of all possible worlds” as 126,700 CCF. The options the authors thought more likely to work were a sustainable annual sawtimber harvest level of 72,400 to 90,500 CCF. However, all the GTR 422 scenarios estimates of ASQ were considering timber harvest as the only objective of the Forest. They did not factor in needs to further restrict harvest to meet the needs of and laws protecting other multiple uses such as wildlife, watershed or recreation. The a legal ASQ would be much smaller than what is possible due to wood volume, growth and mortality.

We think the current 2023 timber goal of the BBNF is somewhere in the 120,000-130,000 CCF range (maybe 123,600 CCF?), which means it is too high to comply with the Black Hills National Forest Land & Resource Management Plan’s standards & guidelines and other laws. As we believe the Forest continues to plan to cut the Forest’s trees at an unsustainable rate - this sale, when considered with other sales, will cumulatively cause you to violate the Multiple Use Sustained Yield Act, National Forest Management Act, the Black Hills National Forest Land & Resource Management Plan and other laws. This unsustainable cutting needs to be discussed as a cumulative impact.

Cumulation of Mean Annual Increment

Please discuss what the cumulation of mean annual increment (CMAI) is for this area. Are you cutting stands before the CMAI is achieved for this area? If you are, is that contributing to the unsustainable rate of cutting in the Black Hills? How is this legal?

Old Growth

Please identify all old growth stands in the area. Under a presidential order from Pres. Biden 14072 of April 22, 2022 you have to have inventoried all the Forests for old growth and mature forest by Earth Day 2023 (4/22/23). That inventory should be done before you write the final EA. Please disclose all old growth in this area and please identify all stands that are designated as replacement old growth. Please discuss the restrictions on cutting old growth or large old trees in the laws you cite as authority for this timber sale.

Habitat Structural Stages:

How does the Chimera Project move the Northern Hills District toward the Forest Plans Habitat Structural Stage (HSS) objectives? What is the existing condition of HSS, and what will they be post-project in each management area?

Bats

Northern long-eared bat (*Myotis septentrionalis*) became endangered on March 31st. 2023. The determination of effects for Alternatives B and C is “may affect, likely to adversely affect” for the northern long-eared bat. Based on this determination, formal consultation with the US Fish and Wildlife Service under Section 7 of the Endangered Species Act must occur. Since maternity roosts are used May through August, no disruptive activities may occur during those months.

The Northern Hills District is known to host hibernacula and summer roosts for this species. In Roosting habits of four bat species in the Black Hills (2001), Cryan, Bogan, and Yanega state “The availability of suitable roosts influences the distribution and abundance of bats. Quantifying roosting requirements is a necessary step toward effectively monitoring, managing, and conserving bats.... *Myotis septentrionalis* consistently uses trees. Roost trees were consistently among the largest available and were found in areas of relatively high snag densities. Maintaining forests with high snag densities and large trees will likely benefit bat populations in the Black Hills.”

Goshawk:

We are worried about impacts to goshawks and providing enough large old trees for them. Structural stage objective are not being met in the Forest. That makes the Chimera planning area key to their persistence in the Black Hills.

Beaver

You reference the “near extirpation” of beaver in the Black Hills. Neither SDGFP or BHNF know how many beaver or beaver food caches or dams there are – folks just know there are not many beavers. SDGFP and BHNF are supposed to start an inventory of beaver, maybe this year. Please identify all the location of beaver that you can find, especially during field

work on the timber sale. Hopefully the SDGFP will create a 3-year moratorium on beaver hunting/trapping this spring/summer (maybe). Overhunting, not just habitat may be the cause of reduced beaver. If that moratorium has been instated, let us know where the beaver are. If the moratorium has not happened, please let us know how many are in the Chimera area. Please identify all roads that are near streams, that the beaver may inundate and thus become “conflict beaver”. Please consider moving all roads away from streams.

Scenic Integrity Objectives

I did a search for the word “scenic” or “scenic integrity objectives” and found nothing. Perhaps there is an appendix on the scenery review by the forest landscape architect that you did not attach. As there is no discussion of the scenery we can’t critique it.

Please include a section on scenery and the projects impacts to it and how your plans comply with the scenic integrity objectives (SIO’s) for the area. Please re-examine the SIO from the 1996 Forest Plan. Those are 26 years out-of-date. Also Joby Timm’s computer calculated them in 3 or 5 days from map overlays of various values. The evaluation of the scenery was done by a computer and not ground truthed. Please make sure the SIO matches the ROS assigned to the area. There is a Forest Service Manual or Handbook rule on that.

Please consider the importance of old growth trees and large mature trees to the scenery, especially in the foreground and midground views. Old growth that is achieving bonsai qualities can be quite lovely.

Please consider the importance of mixed stands to the scenery – that stands with both aspen and/or hardwoods mixed together with conifers are lovely. Please consider that often the pine left in aspen stands can be old growth, because it was too much of a hassle in the past to log those so they were left alone. We don’t have much old growth left and don’t log it out of aspen stands.

Aspen growth

Aspen is less fire prone than pine. Please consider increasing aspen acres especially in the wildland-urban interface or near homes. Consider this a fire prevention action and also large aspen stands will break up/disperse

the flight of mountain pine beetle when it returns. Transforming pine to aspen increases the resiliency of the forest.

Removing pine from aspen does not increase it, it just protects status quo. Please consider logging “donut cuts” around aspen – clear cut pine in a circle around the edges of aspen stands so they will send out roots and shoots around their edges.

Mixed stands have a diversity of bird species and are great birding resource, especially if near water.

I am sorry, I wanted to write more, so I may send in some late comments this weekend.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Hilding", with a stylized flourish at the end.

Nancy Hilding