

Additional analysis of timber sales from the Black Hills Resilient Landscapes Project (BHRL) on the Black Hill National Forest June 2021

In May, four timber sales about to be sold on the Black Hills National Forest were found to be fraught with cutting units and road construction not authorized in the BHRL NEPA to which it tiered. Here, we are providing similar analysis of many additional timber sales demonstrating ongoing flaws in the use of NEPA over the entire course of the BHRL project (since the Record of Decision 2018) and across all four Ranger Districts of the Forest.

Our analysis reviewed maps of cutting units in timber sales sold between 2018 and 2021 under the BHRL decision. We compared the sale maps to the maps found in chapter 2 of the BHRL FEIS and the project web site [Forest Service \(usda.gov\)](http://ForestService.usda.gov) These maps are referred to in the BHRL Record of Decision, page 4: [103904_FSPLT3_4389333.pdf \(usda.gov\)](https://www.usda.gov/forestservice/103904_FSPLT3_4389333.pdf)

“My decision to select the Proposed Action, as modified, is a site-specific one (see defined-area maps and descriptions in FEIS chapter 2 and detailed maps available on the project web site). The selected alternative also includes flexibility to define treatment locations within the defined areas. The analysis of effects is based on site-specific data (see Information Sources sections in chapter 3 of the FEIS) and relevant, often locally conducted research and monitoring.”

The tables on the following pages show that the Forest Service sold timber in over 5,300 acres of cutting units that were either partially or entirely outside of potential commercial treatment areas, contradicting the BHRL Record of Decision and Final EIS.

Mystic District – FY18

LYONS (FY18) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
10	172	LIB/OR (liberation/overstory removal)	Only partially within a defined area in BHRL (PCTA) (Potential commercial treatment area)	N
12	53	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
30	45	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Y
66	53	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
67	30	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
69	63	LIB/OR	Not within a defined area in BHRL (PCTA)	N
105	50	LIB/OR	Not within a defined area in BHRL (PCTA)	N
Total	466			

Mystic District – FY18

WHITETAIL (FY18) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
7	84	LIB/OR (liberation/ overstory removal)	Not within a defined area in BHRL (PCTA) (Potential commercial treatment area)	N
15	35	LIB/OR	Only partially within a defined area in BHRL (PCTA)	N
16	17	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
17	72	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
18	5	LIB/OR	Not within a defined area in BHRL (PCTA)	N
19	41	LIB/OR	Not within a defined area in BHRL (PCTA)	N
20	32	LIB/OR	Not within a defined area in BHRL (PCTA)	N
24	11	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
27	62	LIB/OR	Not within a defined area in BHRL (PCTA)	N
32	17	LIB/OR	Not within a defined area in BHRL (PCTA)	N
33	24	LIB/OR	Not within a defined area in BHRL (PCTA)	N
34	80	LIB/OR	Not within a defined area in BHRL (PCTA)	N
36	87	LIB/OR	Not within a defined area in BHRL (PCTA)	N
41	65	LIB/OR	Not within a defined area in BHRL (PCTA)	N
45	18	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
48	59	LIB/OR	Only partially within a defined area in BHRL (PCTA)	N
Total	709			

Mystic District FY19

MARBLE (FY19) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
1	83	LIB/OR (liberation/overstory removal)	Not within a defined area in BHRL project (PCTA) (Potential Commercial Treatment Area PCTA)	N
2	228	LIB/OR	Only partially within a defined area in BHRL (PCTA)	N
3	247	LIB/OR	Only partially within a defined area in BHRL (PCTA)	N
9	85	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
10	79	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
11	50	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
12	29	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
13	404	LIB/OR	Only partially within a defined area in BHRL (PCTA)	Partial
16	~ 100	LIB/OR	Not within a defined area in BHRL (PCTA)	N
18	~ 18	LIB/OR	Not within a defined area in BHRL (PCTA)	N
19	19	LIB/OR	Not within a defined area in BHRL (PCTA)	Partial
31	65	LIB/OR	Not within a defined area in BHRL (PCTA)	Y
Total	~1407			

Hell Canyon District FY20

HOP SPRINGS (FY20) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
11	67	Harvest without restocking	~ 80% not a PCTA (Potential commercial treatment area)	Y small portion
13	193	Harvest without restocking	~ 50% not a PCTA	Y ~ 50%
14	70	OR from advanced regeneration	~ 55% not a PCTA	N
18	26	Harvest without restocking	~ 95% not a PTCA	Y very small portion
25	85	Harvest without restocking	~ 33% not a PTCA	Y ~ 67%
26	49	Harvest without restocking	~ 50% not a PTCA	N
Total	490			

Hell Canyon District FY20

LITTLE BEAR (FY20) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
1	46	Overstory Removal Cut (from advanced regeneration) (EA/RH/FH) (even age/regeneration harvest/ final harvest)	100% not a PTCA (Potential commercial treatment area)	N
4	72	Single-tree Selection Cut (UA/RH/FH)	~ 10% not a PTCA	N
8	39	Single-tree Selection Cut (UA/RH/FH)	100% not a PTCA	N
9	12	Overstory Removal Cut (from advanced regeneration) (EA/RH/FH)	100% not a PTCA	N
10	76	Single-tree Selection Cut (UA/RH/FH)	100% not a PTCA	N
11	85	Single-tree Selection Cut (UA/RH/FH)	~ 88% not a PTCA	partial
13	63	Single-tree Selection Cut (UA/RH/FH)	~ 10% not a PTCA	N
15	54	Overstory Removal Cut (from advanced regeneration) (EA/RH/FH)	100% not a PTCA	Y
Total	447			

Mystic District FY20

SOLOMON (FY20) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
1	58	LTM (leave tree marked)	~ 45% not a PCTA (Potential commercial treatment area)	N
2	61	LTM	~ 55% not a PCTA	partial
3	99	OR (Overstory removal)	~ 45% not a PCTA	partial
4	90	LTM	100% not a PCTA	N
5	83	OR	~ 30% not a PCTA	partial
8	103	LTM	~ 38% not a PCTA	N
10	45	OR	~ 60% not a PCTA	N
14	26	OR	~ 80% not a PCTA	Y
15	38	OR	100% not a PCTA	Y
19	55	OR	100% not a PCTA	partial
21	50	OR	20% not a PCTA	partial
Total	708			

Northern Hills District FY20

COUGAR (FY20) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
4	322	CTM-G (cut tree marked-green)	~ 50% of unit is not a PCTA (Potential commercial treatment area)	Y ~ 50%
Total	322			

Bearlodge District FY20

CHUTE (FY20) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
2	77	Liberation cut	~ 88% not a PCTA (Potential commercial treatment area)	Partial
3	183	Liberation cut	~ 29% not a PCTA	Partial
8	52	Liberation cut	~ 60% not a PCTA	Partial
Total	312			

Bearlodge District FY21

SCHOOL (FY21) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
1	187	OR (overstory removal) – from advanced regeneration	Not a PCTA (potential commercial treatment area)	Y -an extremely small portion
7	30	OR – from advanced regeneration	Not a PCTA	N
8	24	OR – from advanced regeneration	Small portion not a PCTA	N
Total	241			

Bearlodge District FY21

RAVINE (FY21) Unit #	Acres	Treatment	Problem	WUI (wildland urban interface)
5	57	Harvest without restocking	Only partially within a defined area in BHRL (PCTA)	N
7	32	Harvest without restocking	Not within a defined area in BHRL (PCTA)	N
11	11	Harvest without restocking	Not within a defined area in BHRL (PCTA)	N
13	13	Harvest without restocking	Not within a defined area in BHRL (PCTA)	N
20	32	OR	Not within a defined area in BHRL (PCTA)	N
31	78	OR	Only partially within a defined area in BHRL (PCTA)	Partial
Total	223			

This list of sales is just a sampling; there are many more sales with the same issues. In fact, we have yet to come across a BHRL timber sale without issues of cutting units falling outside of sites disclosed to the public as potential commercial treatment areas. Additionally, these sales contain many incongruencies between NEPA authorized roads and implemented roads.

In conclusion, the Black Hills Resilient Landscapes Project (BHRL) as performed over the course of its life, is not site specific as required by law. This demonstrates a regrettable lack of accountability to the public to whom this land belongs, and it indicates just how desperate the Black Hills National Forest is to meet unsustainable timber targets. It is also symptomatic of the decade-long unsustainable level of cutting on the Black Hills National Forest and is destructive and unacceptable on every front - socially, environmentally, and economically.