



**Norbeck Society
P. O. Box 9730
Rapid City, SD 57709**

April 29, 2024

Patrick Champa, District Ranger
Elizabeth Krueger, Bearlodge Ranger District Resource Planner
Bearlodge Ranger District
Black Hills National Forest
P.O. Box 680
Sundance, WY 82729

Re: North Sand Forest Management Project 65540 - Scoping

Dear Ranger Champa and Planner Elizabeth Krueger,

As part of our mission to advocate for sustainable use of public lands, Norbeck Society comments reflect a desire to support a management approach for the Black Hills National Forest (BHNF) that recognizes the imperative of protecting and enhancing the biocomplexity of forest ecosystems that serve and support growing numbers of people. A vision for long-term sustainability of all aspects of the land is paramount.

The Norbeck Society wishes to ensure that benefits flow perpetually to those who come after us. People in the future will rely on the graces of the Black Hills National Forest just as we do.

On the following pages, you will find our comments on scoping for the North Sand Forest Management Project. We request that you include them in the project files.

As always, we appreciate the opportunity to provide input to the USFS about the management of the Black Hills National Forest.

Sincerely,

Mary Zimmerman, President
On behalf of the Norbeck Society

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Norbeck Society Comments
North Sand Forest Management Project (NSFM) Project 65540
Scoping
Bearlodge District, Black Hills National Forest
April 29, 2024

We look forward to seeing maps of more specific locations contained in this project as well as the details of the anticipated effects, but as proposed, this is not a project we can support at this time for the following reasons:

1. **Precious and Fragile Forested Ecosystems:** This is an important area that is one of the last shreds of primeval forest in the Black Hills. It is precious. It is fragile. The North Sand Forest Management Project details discuss mechanical logging and mechanical thinning -much of it on steep slopes on a landscape described as “plateaus separated by rugged canyons. Cliffs, rock outcrops, and steep slopes are common.” NSFM includes treatments in a Botanical Area (MA 3.1), an area managed for Late Successional Forest Landscapes (MA 3.7), Big Game Winter Range (MA 5.4), and Forest Products, Recreation, and Big Game (MA 5.6). No amount of this precious and fragile habitat is disposable.
2. **Forest Plan Revision Process:** This project promises to short-circuit Forest Plan Revision and the benefits of a management more suited to the changed conditions across the forest including the North Sand project area. Imagine the difference between looking at the NSFM project area through the lens of managing the land for timber production and what the new planning rule requires – using timber to manage the forest. The conversation will be different. Under the new planning rule, timber will not be a driver for the plan to achieve. It will be a tool, not an outcome. For example, if it is decided that a finer mosaic of habitat structural stage objectives across the Forest is desired, the NSFM project could render that difficult to achieve in the next 70-100 years. We know old growth is important. We know uneven-aged management is better. We know we need better ways to contain weed infestations. We know better....
3. **Allowable Sale Quantity:** The current Forest Land Resource Management Plan lacks an amendment modifying the Allowable Sale Quantity (ASQ) as a stop gap in the interim

between now and a new Forest Plan. The lack of such is contributing to the drive to continue overcutting.

4. **Unsustainable Timber Program:** The current timber sales volume target is unsustainable, and logging is damaging many values across the forest. We do not want to see the North Sand area begin to slide down that slippery slope of overcutting. Sure, the proposal says there won't be any overstory removal or clearcutting, but how will Forest Service satisfy the bloated regional industry infrastructure once this project is complete? For example, the Mystic District expects to analyze the entire District for timber product again over the course of the next three years. Meanwhile, Northern Hills District seems to be on an every-5-years program. What is the volume expected to be extracted from this project? What is the anticipated volume per acre? Over how many years?

The Norbeck Society has good reason to be dubious of the rationale for all proposals that entail commercial harvest. Current harvests are politically driven, often to the detriment of the greater good. If Forest Service believes a healthy timber industry infrastructure is necessary for good forest management (albeit carbon-emitting), harvests levels must be reduced. Forest Service should state parameters for the desired volume of standing live inventory and how they plan to stay within those parameters. This project should not contribute to unsustainable annual sales quantities.

The Norbeck Society does not want these parcels harnessed as tree farms. What proportion of the planning area is part of the unsuitable base? Can you tell us what rate of harvest is sustainable on the unsuitable base?

5. **Past Performance:** If past performance is an indicator of future ability, Forest Service will not be able to execute this plan as outlined. Most people familiar with the Black Hills National Forest and who understand management options have known for a long time that harvests need to be reduced and acres of TSI and prescribed burning need to be increased dramatically. We note that the Rattlesnake Project occurred on this area.

In the Draft EA, please provide a side-by-side comparison of future desired conditions and current conditions and itemize how the full suite of proposed actions will move various areas in the project towards the desired conditions. Please outline how the desired outcomes will be affected if prescribed burning is not done and weed treatments are not effective. Unless the proposed commercial treatments are followed with periodic prescribed burning, we think there will be very little or no return on the proposed hazardous fuels investment.

In the Draft EA, please also include two lists pertaining to items authorized in the portion of the Rattlesnake Project that overlap with the NSFMP project area; one listing of actions that were completed, and the other of authorizations that were not completed. This will give the public a better idea of how the North Sand Project will go.

These were the treatments authorized (from the FEIS):

1.6.2 Summary of Proposed Action

Below is a brief summary of alternative B, the proposed action. This proposal and other alternatives are presented in more detail in chapter 2.

Proposed activities include:

- Non-commercial thinning of pine on 3,951 acres to reduce fuel continuity and release overgrown and stagnant stands.
- Removal of small pine from 363 acres of aspen stands to maintain aspen as the cover type.
- Removal of small pine from a 62-acre stand of mature oak to reduce competition.
- Commercial harvest of pine on 10,179 acres. Treatments include commercial thinning (4,238 acres), group selection (384 acres), uneven-age individual tree selection (1,400 acres), shelterwood seedcut (1,567 acres), and overstory removal (2,302 acres). The purpose of these treatments is to reduce hazardous fuels, improve stand vigor, growth, and structural diversity, enhance wildlife habitat, and produce merchantable timber.

- Reduction of fuel loading and continuity and enhancement of wildlife habitat through controlled burning. A total of 6,142 acres would be burned under alternative B. Of that total, 978 acres would be burned following timber harvest or other vegetation treatments, and 5,146 acres would be burned without prior treatment.
- Mechanical treatment of standing and down fuels on 176 acres.
- Thinning and hand-piling of fuels near Red Canyon subdivision and along NFSR 863.
- Creation of a shaded fuel break on 288 acres in Rattlesnake Canyon.
- Pine removal from meadow areas on 666 acres across the project area to curb pine encroachment into open areas; this includes manual cutting and piling of pine on the overgrown edges of a montane grassland on Cement Ridge.
- Construction of 1.5 miles of new roads, conversion of 8.7 miles of existing non-system roads, major reconstruction of 3.1 miles of existing system roads, minor reconstruction of 98.6 miles of existing system roads, maintenance of 11.1 miles of existing system roads, and construction of 8.0 miles of temporary roads, all in order to access timber stands.

6. **Forest Monitoring:** Monitoring across the forest including the NSFM project area is insufficient. Management actions are rudderless because scheduled monitoring has not occurred.

Annual Forest Monitoring last took place in 2014 and 2009. Five-year Forest Monitoring last took place one time only - in 2012.

In 2016, a process began to install changes to monitoring protocols on the Forest to comply with the 2012 Planning Rule. In 2017, the protocols were to be adopted:

We expect to issue the next monitoring evaluation report no later than two years from the date of approval of the administrative change for the modified forest plan monitoring program. The forest plan monitoring information will be evaluated every two years thereafter, and will continue to be used to inform management of the plan area.

7. **Rattlesnake Project Monitoring:** In conjunction with the North Sand Draft EA, we would like to see the monitoring documents for the Rattlesnake Project. The 2010 Record of Decision for the Rattlesnake Project includes an attachment, Section 6 – Monitoring. In addition to promising Forest Monitoring, it includes the specific items below for the Rattlesnake Project. We would like to see these documents to achieve a better understanding of the consequences of these entries into the NSFM project area:

Section 6 – Monitoring

The Forest Plan identifies specific items to be monitored, and the Forest Plan monitoring implementation guide describes monitoring protocols for numerous resources. The guide identifies frequency and methods of data collection, units of measure, sampling design, expected precision and reliability, reporting frequency, data storage location, and costs. The guide is subject to periodic adjustments.

The ID team for the Rattlesnake project compiled additional monitoring objectives and items, summarized below. These items provide emphasis regarding particular resource monitoring needs in the project area.

- Project engineers, resource specialists, and sale administrators will conduct field review of timber haul routes prior to sale of any timber.
- District archeology staff will monitor known heritage sites eligible or potentially eligible to the National Register of Historic Places before and after project implementation.
- Prescribed fire managers will establish photo points in prescribed burn units to compare pre- and post-treatment conditions and document fire behavior during implementation.
- Fuels staff will evaluate effectiveness of fuel treatments in reducing fuel loading.
- Project managers will monitor revegetation of disturbed and burned areas to determine need for additional measures and noxious weed control.
- Wildlife staff will monitor known and suspected goshawk nests for nesting activity annually or as funding allows.
- Engineering and hydrology/soils specialists will monitor effectiveness of erosion control measures (seeding, water bars, etc.) 1 and 3 years following installation as funding allows.
- Hydrology/soils staff will monitor soil compaction at a sample of timber sale landings and harvest units as funding allows.
- Timber sale administrators and hydrology/soils specialists will monitor application and effectiveness of best management practices.
- Monitoring of sensitive and species of local concern plant occurrences will take place as specified in the Black Hills National Forest monitoring implementation guide addendum.
- Smoke conditions during burning operations will be monitored in accordance with the Clean Air Act. Fire managers will model smoke production and dispersal prior to prescribed burns to ensure requirements are met. Impacts on populated areas such as Spearfish, South Dakota will be assessed at the time of burning.
- The district planning team will monitor project implementation following completion of activities.

The Boundary Timber Sale was part of the Black Hills Resilient Landscapes (BHRL) Project. Is there a monitoring document for the BHRL Project?

Was any logging done in the NSFM project area under the Pine Beetle Response (PBR) Project?

8. **Cumulative Effects and Time Frame:** Please disclose effects of this project combined with others. Over how many years would implementation take place?
9. **Habitat Structural Stage Objectives** which were considered important in the near past (BHRL 2018) do not allow for any more old growth or mature trees to be cut especially considering the need for recruitment of SS4 into SS5 which is at a great deficit.
10. **Carbon Emission and Carbon Storage and Wildfire and Prescribed Burning:** The timber industry is a huge emitter of carbon into our atmosphere.

From Marina Richie, author of “Halcyon Journey, In Search of the Belted Kingfisher,” winner of the 2024 John Burroughs Medal for distinguished natural history writing, a 2022 National Outdoor Book Award and a 2022 Foreword Indies Award.

What About Staying Safe from Wildfire?

“Whenever anyone hears the word “wildfire” in this heating-up world, there’s an element of understandable fear, even if we are aware that wildfires have long shaped many western forests. We might shrug our shoulders and think, “if this is what the Forest Service has to do to protect us from fire, then we have to accept the damage of cut-over and mowed forests.” But will these massive logging and mowing projects keep us safer? I worry about wildfires, too, as our summers grow hotter and dryer.

We must go straight to the cause of wildfires that are becoming so deadly to people and drastically cut fossil fuel emissions. We can’t log and mow our way out of the wildfire crisis. Like cutting off one’s nose to spite one’s face, logging is adding more emissions and removing our best source of carbon-capture—our trees. The bigger and older the trees, the more carbon they store and for longer periods.

We know from recent wildfires that when there’s record-breaking heat, high winds, and drought, only autumn rains and snow will put them out. Many fires burn hottest over logged lands where wind-driven flames speed through opened up forest, often fueled by weedy understories. In contrast, they tend to slow down when entering cooler, lush forests.”

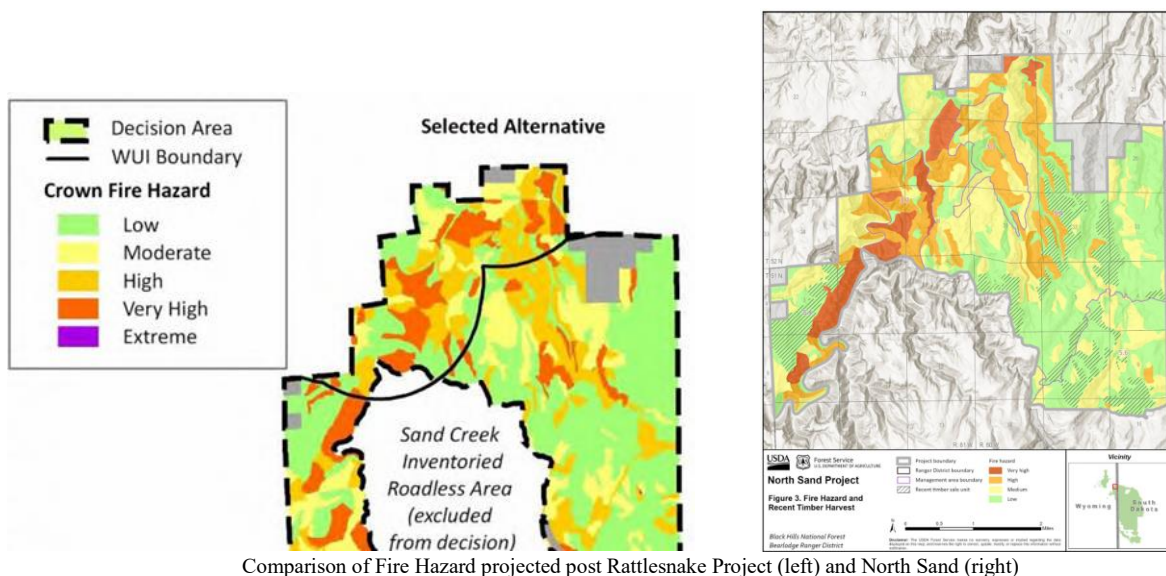
The Norbeck Society is concerned about negative effects from wildfire, but does not necessarily see the proposed project as a way to address the issue.

While most of the project area is not in the WUI, it has been shown that the most important factor for safety of those residents who are near the project area is what they do in the 300 feet immediately around their buildings. There is no substitute for fire-wise practices on private land.

It appears that buildings in the project vicinity are in low lying areas.

We sense a contradiction in the idea of saving us from wildfire by cutting down big fire-resistant trees and securing regeneration of young trees. A tree farm is a dangerous place for longer periods of time compared to a forest where prescribed burning is used to mimic historical conditions. We think far greater use of prescribed burning is appropriate and long overdue. Where will the Bearlodge District use Rx burning on @2000 - 2500 acres this year?

If you can, please offer a narrative about the maps below that show the “after” Crown Fire Hazard projected after the Rattlesnake Project, and the North Sand current Fire Hazard map. What are the drivers behind fewer areas in the WUI with lowered risk?



11. **Old Growth and Late Successional Landscapes (MA 3.7):** It is difficult to believe these areas can be “improved.” Please show some photos showing the current status of stands you plan to log.
12. **Wildlife habitat:** Please outline how the proposed activities will affect wildlife habitat. We are particularly concerned about threatened and endangered species, Sensitive species, and Species of Local Concern.

The American Goshawk (at least 2 nests noted in the project area) not only need suitable nest habitat, but also habitat for their prey. Recent peer-reviewed and published research

confirms that logging is a major factor in suitable nest site habitat loss on the Black Hills National Forest.

13. **Botanical values and the Dugout Gulch Botanical Area (MA 3.1):** We are concerned that plant habitat and unique plant life will be compromised by the NSFMP project. It is difficult to fathom how mechanical treatments can be done in the Botanical Area without destroying the unique botanical values in the area.
14. **Weeds:** Currently, weeds are not being controlled across the forest. How would this project be different? We are not convinced that machinery is properly cleaned and if weeds are present, machines drag them around and spread them. Can Forest Service solve the Buckthorn problem? How will it not get spread even further during project implementation? What other weeds are present and what has been done to control them?
15. **Steep Slopes, Economics, Damage and Lost Opportunity Costs:** Steep slope logging is not a viable treatment. It is too costly and does too much damage. Same with helicopter logging. Taxpayers should not be asked for “dedicated funding” because that funding would be better put to use with more effective, less costly, and less damaging treatments. We note that recent research finds that treatments on steep slopes are not as effective as those on flatter ground. The Rattlesnake Project documents talk about erosive soils that have been damaged in the past. We are concerned about the damage to soils and vegetation caused by tethered logging.

The cost of the Rattlesnake Project was something like \$8,000,000. What is the estimated cost of the NSFMP project? Why can’t those funds be used for the more pressing needs like Prescribed burning on the district? Please provide a breakdown of costs, i.e. for roads, tethered logging, prescribed burning, etc.
16. **Mechanical Site Prep (Scarification or MSP):** The Norbeck Society does not support use of this treatment. There is no science regarding its effectiveness. It’s an invitation for weeds, and here in the NSFMP projects it is suggested that it would be used to get young Pines to grow in the Oaks which are stated to be fire resistant. This seems contradictory to the stated Needs and Opportunities.
17. **Meaningful Work:** Forest workers deserve meaningful work. They should not be asked to do work that damages the forest. There are things that people can do on the ground, where they actually encounter and understand the complex innerworkings of nature, without the heavy equipment required for the mechanized treatments described in the NSFMP proposal. Please consider using hand thinning, small piles, and broadcast Rx burning. This is an important part of re-evaluating our relationship with the land.
18. **Specialist Reports:** Please publish these before the next comment period so we can better understand the impacts of the NSFMP project.

In Conclusion: Our Relationship with the Land.

The Norbeck Society comments presented here are in line with our continued scrutiny of the Black Hills National Forest Timber Program which is responsible for making a lot of areas on the forest not so precious anymore.

The Norbeck Society believes we need to revisit our attitudes towards the land. Coming off an era of taking, we find ourselves at a time when giving to the land will be required if we wish to continue to receive its graces. What better time to do that than Forest Plan Revision?

The Bearlodge District should consider putting this project on hold until Forest Plan Revision is complete.

Thank you for the opportunity for stakeholders to provide comments and ask for information about forest management projects like this one.

~ The Norbeck Society



Project name	District Bearlodge ~ 200,000 acres	Decision year	<u>commercial treatment</u> acres total acres in project area	EA Purpose and Need or CE clause	Contiguous and/or overlapping with other CEs and EAs?
North Sand Forest Management Project	Bearlodge		Including recent logging, project area has mechanical treatments on more than 70% of 11,062 acres in project area	EA Needs and Opportunities - comparison of desired and existing conditions shows a need to: • Reduce uncharacteristically high fire hazard that could threaten developed areas, public safety, rare plant populations, late-successional pine forest, raptor nesting habitat, and other values. • Increase growing space for pine trees across a range of sizes. • Restore openings and low-density forest on south-facing slopes. • Diversify species composition where understory is dominated by oak shrubs. There are opportunities to address these needs through commercial and non-commercial timber harvest and thinning, mastication, other fuel reduction activities, tree planting, and prescribed fire.	BHRL On template of Rattlesnake Project
Northwest Hazardous Fuels Reduction	Bearlodge	2024	238 thinning, retention of most fire-resistant trees of 403 project area	CE HFRA Section 605(c)(2)(C)	no
Shotgun	Bearlodge	Scoping August 2023	1237 acres OR Total project area ~4710	FLRMP Goal 2 variety of life, Goal 3 sustained commodity uses in an environmentally acceptable manner, and Goal 10 decrease potential for uncharacteristically intense wildfire/ facilitate firefighting capacity.	
Fish	Bearlodge	2022	668 ~3992	CE - Insect and disease 603 (HFRA) (16 U.S.C.6591d) (FSH 1909.15, 32.3(5))	no
Isolated Parcels 1	Bearlodge	2022	Unknown (incl. IP 2b-4d below) 527	CE - unknown	no
Isolated Parcels 2a		2022	40		
Isolated Parcels 2b		2022	40		
Isolated Parcels 2c		2022	120		
Isolated Parcels 3		2022	958		
Isolated Parcels 4a		2022	40		
Isolated Parcels 4bc		2022	120		
Isolated Parcels 4d		2022	40		
Moskee	Bearlodge	2022	1296 ~4423	CE - Restoration objectives or increasing resilience. 36 CFR 220.6(e)(25)	BHRL
Woods	Bearlodge	2022	893 ~28,865	CE - Timber stand improvement and/or wildlife habitat improvement 36 CFR 220.6(e)(6)	BHRL
Project Areas of 2022-24 encompass about 27% of the 200,000 acre Bearlodge Ranger District					