

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
June 10th, 2024

Attn: Davis Project
Patrick Champa
Bearlodge Ranger District
P.O. Box 680 / 101 S. 21st St.
Sundance, WY 82729
patrick.champa@usda.gov

RE: Davis Hazardous Fuels Reduction Project

<https://www.fs.usda.gov/project/?project=66020>.

PHAS comment Letter # 1

Dear Forest Service Staff,

In your scoping letter you write:

“This proposal falls into a wildfire resilience category authorized by Section 605 of the Healthy Forests Restoration Act of 2003 (HFRA, 16 U.S.C. 6591 et seq.), as amended by the Consolidated Appropriations Act of 2018 (Public Law 115-171). The wildfire resilience categorical exclusion may be used to carry out a hazardous fuels project in an insect and disease treatment area that was designated by the Secretary under HFRA Section 602(b) by March 23, 2018 (HFRA Section 605(c)(2)(C)). The area was designated by the Secretary on May 20, 2014 (Tidwell, 2014).” (emphasis added)

Was this area designated as a disease & insect treatment area(s) in 2014, because of insects or disease (or both)? We assume it was because of mountain pine bark beetle. We question the designation of disease & insect treatment area(s) that are 10 years out-of-date.

The mountain pine beetle epidemic was supposed to have ended in spring of 2016, after this area was designated in 2014. Does it now still have either epidemic or normal insect activity (or both)? If insect activity has transitioned to normal activity, why is it still an insect & disease treatment area and still qualifying for a CE?

You write:

“Many of the nearby and included Forest Service parcels (see attachment) have been thinned in recent years as authorized by other decisions, including the Wish Project (September 1998), Potluck Mountain Pine Beetle Project (May 2012), Rattlesnake Forest Management Project (April 2010), Buttes Forest Health Project (March 2013), and the Moskee Forest Management Project (September 2007). The Cement Fire (2005) impacted the northwest corner of the project area.”

Is the year given for the above projects, the year the timber sale was approved or the year it was finally cut? There are projects listed in 2010, 2012 and 2013. Was the cutting of those projects completed before the assignment of the area as an “insect and disease treatment area” in 2014?

Has the area received any vegetation or fuels treatment in the last 10 years? If so, what treatment & when? Has such treatment addressed any of the reasons for it to be designated as a disease & insect treatment area(s) in 2014? Would any of the earlier sales eventually created conditions that would have effected any of those disease and insect values?

Does the HFRA require for area's conditions to be periodically re-evaluated to see if any changes to conditions on the ground have occurred & if the areas still qualify as an insect/disease treatment area(s)? How long do HFRA assignments last?

We question if there are any sensitive species in the area & if there are extraordinary circumstances. The area should at least be evaluated for sensitive species. We care very much about rare plant & animal species & rare plant communities. The area should be evaluated for such. Are there any existing potential goshawk nesting stands or plans to reserve stands to become future nesting stand areas?

Some of treatments seem to overlap drainages, what will be any activities in the drainage bottoms and any impacts to drainage bottom areas? What are impacts to soils? Is there any logging planned for steep slopes?

Is this area all in the WUI? Maps of the WUI should be shown. Is the WUI based on real buildings, or just private land, without buildings? If parts of areas are not in WUI, then guidance tiered to WUI doesn't apply.

Maps of structural stages & cover type should be shown. Maps of road work proposed & future road closure/obliteration should be shown. Maps of topography should be shown. The Legend of the map does not make sense – you can figure out where commercial thins will occur, but not non-commercial thins or “non-commercial wildlife” will occur.

Please discuss the SMS values. The 1997 Forest Plan assigned scenery values 28 years ago. Please re-evaluate all the 1996/1997 SMS assigned values to up-date them to current conditions. Structural stages & cover types were part of evaluating scenic attractiveness. At least these have changed. Sensitivity levels can have changed also.

There are too few SS 5 areas on the Forest. The Davis project should not cut any 4B or 4C structural stage stands, so as to provide for future and replacement old growth. Large diameter trees are rare on the forest and should not be cut down. Please evaluate the snags and future snags for the area.

We think the Forest Service should be engaged only in sustainable logging and should not be cutting more than 60,000 CCF per year. What are your current goals for CCF cut/year? How will this cut, when considered with all the other cutting you plan, contribute to a not-sustainable cut and a violation of the Multiple Use Sustained Yield and Forest Service Management Act?

Please evaluate the area for non-motorized recreation. Are there any areas that would qualify for SPM or SPNM ROS class. Could any areas qualify for such if managed differently? What hiking trails are offered and what is the quality of scenery and pristine nature of area viewed along such trails? How many yellow barks are seen on such trails? What is the diversity of cover type seen from trails. What are the conflicts between motorized and non-motorized recreation and how will your activities effect such?

Please evaluate the weeds and impacts from the project to any likely weed spread. Please reseed only with native species. Are any native plant seeds you will use normally in this area? How pristine are the local plant communities? How many invasive species are in the area and how close are they to your logging or stacking areas?

While you are out there, please look for beaver and streams that could benefit from beaver dam analogs. Can any timber cut in this activity be used for building beaver dam analogs, rather than purchasing pole logs from timber supply companies? If so, can piles of poles or other cut trees to be used for such BDA, be left near the streams in a planned/coordinated activity with your hydrology or wildlife department or whoever builds BDAs?

If you burn piles of logs/trees, will the wildlife who have made a home in the piles be burned up and is there any way to mitigate such immolation? Will immolation of wildlife in burn piles effect any sensitive species – due any sensitive species you might find in the area use stacks of logs for homes?

Thanks,

A handwritten signature in black ink, appearing to read "Nancy Hilding". The signature is fluid and cursive, with a small loop at the end.

Nancy Hilding
President
Prairie Hills Audubon Society