



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

May 10, 2024

Patrick Champa, District Ranger  
Ryan Tallmadge, Bearlodge Ranger District assistant resource planner  
Bearlodge Ranger District  
Black Hills National Forest  
P.O. Box 680  
Sundance, WY 82729

Re: Davis Hazardous Fuels Reduction -66020

Dear Ranger Champa and Planner Tallmadge,

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 the Davis Hazardous Fuels Reduction 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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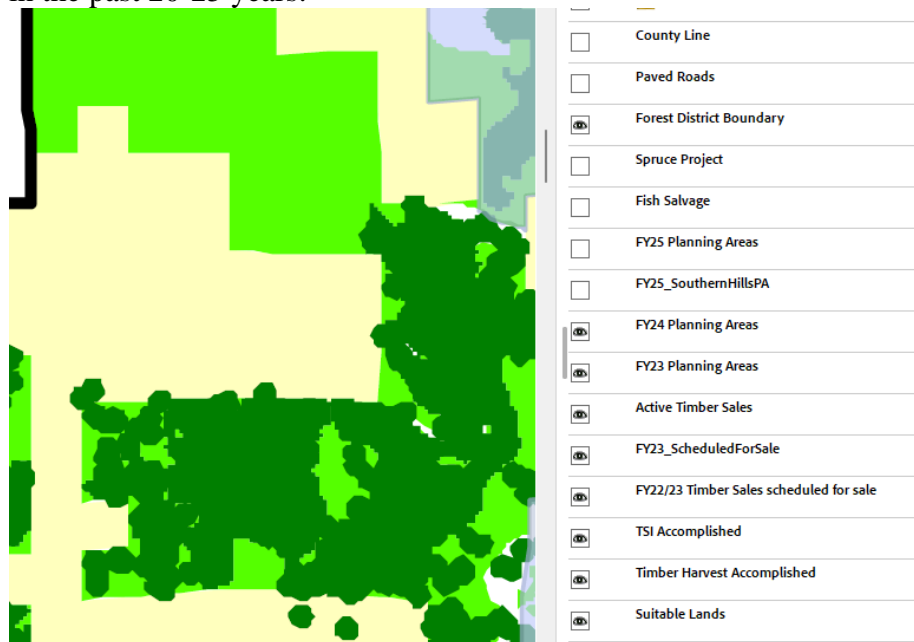
Norbeck Society Scoping Comments  
**Davis Hazardous Fuels Reduction (DHFR) Project - 66020**  
Bearlodge District, Black Hills National Forest  
May 10, 2024

What is the cost of this project compared to federal assistance to the three homeowners mentioned for retrofitting their houses to withstand fire? Have these property owners done vegetation treatments similar to the propose DHFR treatments on their own forested lands? Have these homeowners requested or commented on this project?

The Bearlodge District might consider putting this project on hold until Forest Plan Revision is complete and/or at least until the 3 private landowners start logging their forests and/or working towards creating a defensible space and/or use inflammable materials to protect structures. It seems unlikely that actions taken at such a distance from private structures will have meaningful impacts if there is a wildfire – especially on a windy day – a scenario which becomes more likely with climate change. In such a situation, fireproof construction will be far more effective. Note, the timber industry is one of the biggest emitters of carbon.

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.

According to a recently produced BHNF map, much of this project area has had harvests and TSI in the past 20-25 years:



Please explain how these treatments have not already contributed to the goals of the DHFR project.

Most people familiar with the Black Hills National Forest and who understand management options have known for a long time that commercial harvests need to be reduced and acres of TSI and prescribed burning need to be stepped up dramatically. Unless the proposed commercial treatments are followed with periodic prescribed burning, it's possible there will be very little or no return on the proposed hazardous fuels investment as compared to effects of fireproofing the 3 residences.

Will proposed treatments be uneven or even-aged management?

If going ahead with this project, we suggest working to stabilize the ability of these areas to store carbon in live trees, consider harvesting only on snow or frozen ground and allowing native plants that are present (if they are) to fill in over subsequent years instead of seeding. Monitor and treat weeds if necessary. Address regen with Rx burns.

Thank you for the opportunity for stakeholders to provide comments and ask questions about forest management projects.

~ 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?
Davis Hazardous Fuels Reduction	Bearlodge	2024	commercially thin up to 627 acres of 1304 project area of which 1168 is forested	3 residences w/I 1.5 miles 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)).	? 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.
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	<u>1237 acres OR</u> 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	<u>668</u> ~3992	CE - Insect and disease 603 (HFRA) (16 U.S.C.6591d) (FSH 1909.15, 32.3(5))	no
Isolated Parcels 1	Bearlodge	2022	<u>Unknown</u> (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	<u>1296</u> ~4423	CE - Restoration objectives or increasing resilience. 36 CFR 220.6(e)(25)	BHRL
Woods	Bearlodge	2022	<u>893</u> ~28,865	CE - Timber stand improvement and/or wildlife habitat improvement 36 CFR 220.6(e)(6)	BHRL
			<b>Project Areas of 2022-24 encompass about 30% of the Bearlodge Ranger District</b>		