

Thank you for the opportunity to comment on the Sawbuck project.

A portion of the project area is located in Lawrence County and as previously discussed, forestry and fuels management in adjacent counties affects Lawrence County. We believe that active management of the BHNF is the best approach to achieve healthy, resilient forest conditions.

We agree with your statement in the scoping notice that many areas in the project area have departed from the desired condition. We support the consideration of a full range of management tools to achieve desired conditions. While we express concern from time to time on how a particular management tool or method is applied, it is important for us to communicate that we are in full support of the application of the various tools and methods as described in the proposed project description provided, they are applied appropriately and in a coordinated manner.

You will note that some of our comments are based on observations or concerns about recent projects on the BHNF. Many of these observations and concerns apply to the Sawbuck project as described in the comments below.

It is rare for the USFS to initiate a project of this size without a scoping meeting. Given the scale and complexity of this project, we are requesting a meeting between the BHNF, local government and stakeholders be held to discuss the project.

Lawrence County is requesting cooperating agency status for the Sawbuck project. If cooperating agency status is denied, we request a written explanation from the BHNF in a timely manner.

NOTICE OF PROJECT AND SCOPING

The scoping notice and descriptions on the BHNF schedule of projects website focuses primarily on conditions on Forest System lands without adequate consideration of the numerous, intermingled private land holdings in the project area. There does not appear to be any consideration for the opportunities to work with local communities or landowners to leverage funds or accomplish shared projects. Please note that even if projects within the Sawbuck area are limited strictly to Forest System land, private lands can be impacted.

For a project of this scale, a draft EA should be made available, and a second comment period is provided.

If they have not already been notified, we request that grazing permittees and all landowners with the project area be notified directly about the Sawbuck project as forest treatment projects and riparian restoration can affect their operations.

Current conditions.

Project area stocking levels and species is very diverse due in part to the impacts from mountain pine beetle and the Jasper Fire.

- Large areas of ponderosa pine with significant mountain pine beetle caused mortality and dead and down wildland fuels.
- Heavy regeneration is prevalent throughout most of the project area.
 - as a single story
 - understory.
 - Mixed in with scattered overstory and heavy dead and down trees.
- Scattered areas of overstocked stands of pine overstory
 - In some areas this is significant
- Decadent stands of aspen are present.
- Aspen sprouting occurring in areas.
- Spruce has increased its presence
 - In large areas that were previously pine overstory with spruce understory, the pine has been killed by mountain pine beetle leaving heavily stocked stands of small to medium sized pine.
 - Spruce regeneration is present in many seral pine stands.

CONCERNS AND RECOMMENDATIONS

Watershed and Riparian Restoration

We support the restoration of riparian areas using beaver dam analogs and low-tech methods of restoration. We suggest that Zeedyk style rock structures also be considered as they are also a viable option. There are a number of publications about the use of these types of structures through Utah State, Riverscape and NRCS publications.

We request that grazing permittees be actively involved in the planning and implementation phases of individual riparian restoration projects. It is important for them to understand and be involved in the process so they can plan accordingly. Their cooperation is critical to a successful outcome.

There are two large lakes that could be severely impacted by a large wildfire that occurs downstream of the project area. We recommend that the BHNH should work with the state, counties and other interested entities to develop comprehensive plans on how to protect these lakes and the Rapid City watershed. There are other National Forests in Region 2 where multiple agencies, NGOs, water utilities, cities and counties are working together to protect these valuable resources. Please loop the Bureau of Reclamation in as they manage resources that could be affected.

Project Size

This is a very large project area. Roughly one third of the Mystic District. There is no reasonable explanation to have this size of project. NEPA project life is generally limited to 10 years which severely limits the BHNF in treating all these acres. In addition, forest conditions and USFS policy (i.e. BHNF Forest Plan Revision, etc.) will most likely change over this time period possibly making some of the existing management rationale obsolete. We are concerned that by having a project this big, there will be a hesitancy to reenter this project area in the near future.

Commercial Timber Harvesting

It is unreasonable and disappointing for the BHNF to only propose commercial timber harvesting on only 4,000 acres of 112,000 acres of ponderosa pine and 4,700 acres of spruce over the next 10 years. Even when you add in the 17,500 acres of timber sale acreage that has been implemented over last 10 years, the USFS is only planning on treating less than 19% of the conifer acreage under this EA. There are presently thousands of acres where there is a heavy understory of pine and spruce regeneration under a partial conifer overstory that needs to be treated by removing most, if not all of the overstory. It is highly recommended that BHNF does not try to only precommercial thin these areas and leave seed trees in the overstory. If that happens then there is very high likelihood that these seed trees will then reseed those areas where the precommercial thinning took place creating another layer of regeneration and pretty much making the previous precommercial thinning worthless.

There are also significant areas where spruce is taking over previously pine sites. We are not talking about steep north slopes that have been historically spruce but the upper slopes where pine has been present for at least hundreds of years based on photographs and tree ages. These seral pine sites need to have the commercial spruce removed by timber harvest and the spruce regeneration treated by mastication and Prescribe Fire to encourage pine to regenerate

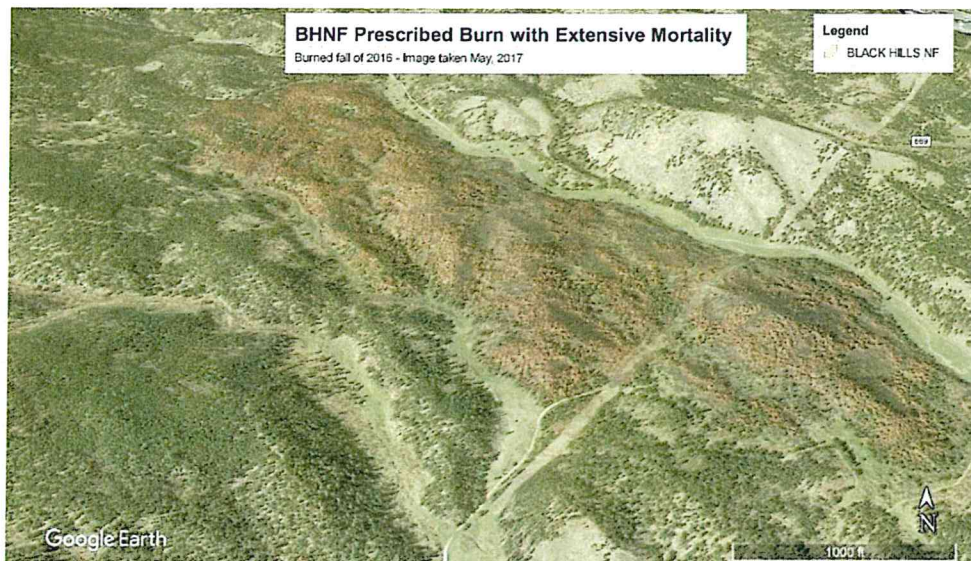
Most areas that have the potential for commercial and/or precommercial treatments over the next 10 years should be analyzed and cited in the EA as potential mechanical treatment areas.

Prescribe Fire

In general, we support the use of Prescribe Fire as an important tool in management of fuels and forest health, but we are concerned about the amount and type of prescribed burning that is proposed. The BHNF is proposing to allow Prescribe Fire on all 134,211 project acres over the next 20 years. We find this very misleading, because there is no possibility that this will happen. It is quite apparent that the BHNF would like to have the flexibility to prescribe burn wherever and whenever they would deem prudent within this

project area. We question the authority under this EA to allow Prescribe Fire over a 20 year period. We have concerns with the amount, the length of time and lack of transparency surrounding the goals and potential negative impacts that are not disclosed and mitigated through design features. Our concerns are based on recent past EAs and how prescribe fire was addressed in past NEPA projects on the Black Hills.

Below is a 2017 Google Earth photo of a 2016 prescribed fire in the Black Hills NF which resulted very high tree mortality. The next photo was taken in 2022 and shows that this area is now pretty much a brush and weed field with high amounts of dead and down fuels. This certainly has significant detrimental impacts on the forest health and wildland fuels conditions on this area of the BBNF. This is not an isolated occurrence.

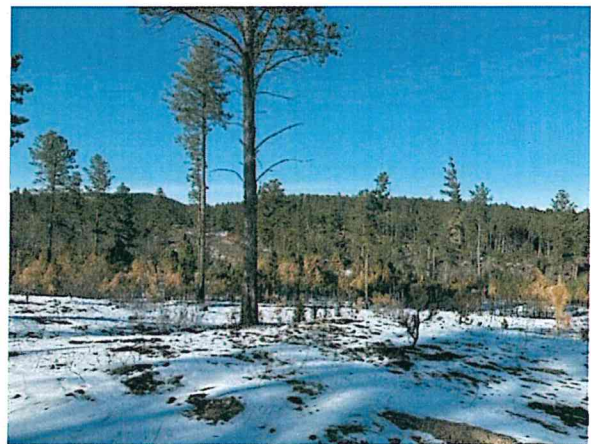




Recent (last fall) prescribe burn that killed most of the your regeneration in this area



The photo above is of prescribe burn that killed a large patch of timber resulting in significant wildland fuel (slash) on the ground



Prescribe Fire is often given differential treatment by the BBNF when compared to impacts resulting from any type of tree cutting. Beneficial impacts are usually glowingly described but potentially detrimental impacts to soils and vegetation and the risk of escape are skimmed over with generalities. A common statement about soil impacts in past Black Hills EAs is that some areas hydrophobic soils could be created but there is no discussion about the amount or where it would occur. In other cases, sediment run off concerns are dismissed by stating that burning would be limited near streams

without any consideration of the sediment movement from erosion on steep slopes that would be burned.

For example, in past EAs such as Zeppelin, 20% of Prescribe Fire would be conducted in areas deemed high risk soils. Yet there is no discussion of the impacts from Prescribe Fire on these soils or streams below these soils based on this fact. In many cases with past BHNF EAs, over 90% of the design features are related to commercial harvest and mechanical treatments and only 10% related to prescribed burning. In the Zeppelin EA there are two design criteria to lessen the impact of Prescribe Fire and 39 specific design features tied to commercial harvest and mechanical treatments of forests.

We also question why prescribe fire is not considered as vegetation treatment. We understand that prescribe fire is used to treat wildland fuels but it has also been used by the BHNF to try to thin regeneration and overstory.

We recommend adding project design criteria that we require that all stands or areas planned for prescribed burning will be pretreated commercially or noncommercially. This is very important since prescribed burning is not very selective, and the Forest Service has not demonstrated an ability to manage the impacts to vegetation from prescribed burning in the Black Hills NF. There have been many cases in the Black Hills NF where the goal of burning was to reduce the dead and down fuels and the prescribe burn kills much of the overstory, which then results in more dead and down trees and fuel loading than what was on the site before the burn. In some cases, design features can be brought over from existing USFS direction and publications. In other cases, simple cross references to other documents or direction would suffice.

We consider this important because in past planning efforts, Prescribe Fire is often proposed as the largest treatment within the project area. When planned and conducted improperly, the impacts can be just as bad as wildfire. A strong NEPA effort is essential so that a prescribed burn plan can be written without concerns about past NEPA adequacy.

The Forest Service Manual 5100 requires the following:

Forest Supervisors must: 1. Approve Prescribe Fire Plans as qualified and certified to do so by the Regional Forester; ensure that Prescribe Fire Plans are designed to achieve Land and Resource Management Plan objectives, and meet service-wide and Regional requirements found in FSM 5140 and the Interagency Prescribe Fire Planning and Implementation Procedures Guide (PMS 484).

We believe that there should be well laid out silvicultural prescriptions for all prescribed burns and those should be summarized in the EA. It is truly an unequal playing field when the Forest Service goes through detailed silvicultural explanations of the proposed mechanical treatments to help the public understand the results and effects, but then

does none of that for proposed prescribed burning. Prescribed burning can have significant negative impacts if it is not properly planned and executed. Even with this, there is significantly higher risk to the designated leave trees when treated by prescribed burning than with mechanical treatments. This also applies when the BHNF attempts to use prescribed burning to try to thin regeneration. In the picture below of a recent prescribed burn, almost all of the regeneration has been killed by the Prescribe Fire under what appears to be a seed cut. This does not make any sense. The whole reason for applying the seed tree cut was to establish a successful stand of young trees. This prescribe burn significantly set back the regeneration succession of this stand. This should not have happened. On other prescribe fire areas in this project where mechanical mastication of the regeneration occurred before the prescribe fire had minimal mortality.

We believe that Prescribe Fire planning should have the same careful planning and rigorous analysis that is completed for other forest management activities. It seems that there is an assumption that standard procedures will mitigate all negative impacts of Prescribe Fire, but the same logic is not applied to commercial harvest or other management activities. For example, Prescribe Fire is planned for large acreages with limited information about preburn treatments, consideration of protection of larger trees and description about how a broadcast burn will accomplish forestry and fuels goals in the selective manner that is desired.

As detailed above, several recent prescribed burns on the Black Hills NF have resulted in excessive mortality. This excessive mortality led to the February 15, 2018 letter from then Black Hills NF Forest Supervisor Mark Van Every which included the following direction.

Mortality Limits

- **Mortality limits should not exceed 5% in timber that is 7" dbh or greater in the suitable base.**
- **Mortality limits for timber less than 7" dbh, inside the suitable base will be determined based on approved silvicultural prescription.**
- **Mortality limits for all diameter classes outside of the suitable base will be determined based on approved silvicultural prescription.**
- **Determination of operable/inoperable ground should be made in consultation with Industry.**

In addition, all approved Prescribe Fire Plans must be signed by a certified silviculturist and existing burn plans already approved should be amended to include the mortality limits identified above.

We would offer the following recommendations regarding prescribed burning –

- **Mortality limits must conform to the February 15, 2018, BHNF letter regarding Prescribe Fire mortality.**

- There should be “zero” mortality of trees over 16.0” DBH in old growth stands and in goshawk nesting habitat.
- Prescribed burning should not cause any stand currently meeting the Mehl definition of old growth to no longer meet the Mehl definition of old growth, based on either loss of trees 16.0” DBH and greater or openings created, or both.
- Prescribe Fire should not be used as the primary vegetative management treatment for ponderosa pine management on suitable acres because it is too risky and non-selective.
- Areas that are going to prescribe burned should be pretreated.
 - Mechanically thinning overstory
 - Precommercial thinning understory.
 - Mastication of dead and down where fuel loading is excessive, and pine regeneration is established.
- Prescribe Fire should not be used to thin overstocked stands of pine regeneration or overstocked overstory.
- Prescribe Fire should not be used in the Jasper Fire where ponderosa pine seedlings and saplings have reestablished.
- Prescribe Fire plans should be made available to the public as part of this project.
- Prescribe Fire on the Jasper Fire footprint should not be a priority.
 - Much of the dead and down tree debris is over 20 years old and is very degraded and has lost most of its BTUs.
- Potential impacts from burning different fuel models that occur within the project area should be disclosed to the public in the draft EA.
- There should be design criteria developed to ensure that the impacts that might occur are mitigated.
- Monitoring should be required along with assessments on the impacts of Prescribe Fire on the live vegetation and whether the prescribe fire met the goals and requirements of the Burn Plan
- Establish design criteria for salvage of commercial trees that killed when the Prescribe Fire exceeds the acceptable mortality established in the Prescribe Burn Plan.
-

While our comments on Prescribe Fire are numerous, we do not want to see the program shut down or projects delayed because of lax treatment during the NEPA planning process.

Thank you for the opportunity to comment. We look forward to meeting with you about the Sawbuck project soon.