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<https://www.fs.usda.gov/project/blackhills/?project=67248>

RE: Buffalo Forest Health Project Scoping Comments

Thanks for the opportunity to comment on this project.

OLD GROWTH AND OLD TREES

We are concerned that within the Black Hills National Forest (BHNF) as a whole, there is an inadequate supply of Structural Stage 5 (SS5) – old growth. There is about .5% left, when much of the Forest has a 5% SS5 objective. We are concerned that with the not-sustainable logging, that is going on in the Black Hills National Forest (BHNF), that we will lose too many individual large old yellow barks, which have wide diameters at breast height, deep crevices in the yellow bark and long distances to overstory branches. These trees with thick and deep yellow bark are resistant to fire. Retaining them in the landscape puts fire resistant trees in the landscape. They are also beautiful to look at and provide habitat for some rare bird & bat species.

Please set a moratorium on cutting ponderosa trees over the larger diameters at breast height. We suggest 16 inches, but it could be larger, such as 20 inches at breast height. But we ask you to create a moratorium on cutting large old yellow barks and you can suggest a diameter level for a moratorium that would protect the most majestic large yellow bark trees on the unit. Let the timber industry take out the smaller black bark adult trees.

Your scoping proposal lacks a discussion of old growth and large diameter ponderosa pine old growth (trees over 160 years old). How many acres of structural stage 5 and how many acres structural stage 4B and 4C exist on the

project? How much of the SS 4B and 4C have older yellow barks and larger diameter trees in them and could evolve to SS5 soonest? Have you identified 5% of the older/denser stands, to reserve as replacement old growth, in addition to the reserving the required percent of SS4B and SS4C for MA 5.1 stands? You need to do that please.

MIXED STANDS

We worry about the BHNF war on mixed stands. Mixed stands, especially if near water and having a diversity of tree heights and species, have an excellent diversity of bird species for bird watchers. They are also beautiful. In the NW area of the forest aspen stands, especially those on slopes, were often the sanctuary for large yellow barks. Past logging did not mess with them, as the loggers had to move around the aspens and there was not that many board feet in a lone pine to make it worth the effort. We want glorious old yellow bark pines with beautiful bonzai like form, that the aspen have been protecting – to be considered a heritage to be left alone. You see these in established aspen stands, that are thick and safe, with an old pine & no baby pines sprouting & encroaching, as the aspens are too thick.

Rather than cutting down all the mixed stands, we suggest you expand aspen stands by cutting doughnut shaped circles around aspen stands thus killing the pine surrounding them. If you need to cut the earth or kill some of the aspen on the edges, to stimulate growth, then do so, but don't kill all the aspen. You sometimes see a few residual aspen hanging on, surrounded by pines. You can expand these by cutting doughnut holes around them. It was natural in the forest, for pine to invade aspen and aspen to expand after fire or beetle kill. The natural forest had mixed stands & stands that expanded & shrunk. . You all want to make a forest of homogenous patches of identical cover types.

BABY PINE TREES

We worry that all those 4A stands that were created to fight mountain pine beetle, have very open canopies and tons of baby pine trees in the sunlight under them, some forming dog hair thickets. These baby pines are the new fire risk for ladder fuels. We want you to provide an inventory of all the SS 4 and SS 3 stands with thickets of baby or small pines under them. What are you doing about baby pine thickets? How much pre-commercial thinning is needed on this timber sale? Do you have money to pay for enough of it? This is the real fire risk on the forest now, not so much the mature trees. Please identify which past timber sales created the thickets of baby pines and what justification was used for the aggressive

thinning and overstory reduction that created the thickets. Do you have thickets of different ages and what methods can be used to reduce them? How many more baby pine thickets will this timber sale create?

WILDLIFE

We care very much about wildlife and protecting rare species. Do you have replacement goshawk nest stands reserved – i.e.: a set of alternate stands, identified to provide for goshawk nests, if other nest stands burn down or suffer from mountain pine beetle? If not, please identify & protect alternate goshawk nest stands. Please discuss your plans for protecting rare bats. Please discuss impacts to black backed woodpecker. What state listed or forest service sensitive species are in the area and how will you protect them?

Please discuss hiding and thermal cover for ungulates. Please discuss disturbance to wildlife by snow mobiles in the winter and how timber cutting may adversely impact habitat security for species seeking relief from snow mobiles.

Please discuss rare snails – are any found in the area? There are some downstream in Rattlesnake Canyon.

PLANTS

Please search for rare plants and protect any you find. Please protect the montane grasslands. We have seen roads or two tracks formed in montane grasslands after activities by man. These two tracks grow weeds. Please prevent any roads or driving across montane grassland and close any roads permanently that may lead to and tempt OHVs from driving across them. Roads create spots of disturbance that bring in weeds. Please protect any other special and unique plant communities.

Please fully discuss your weed management. We are aware that you have classes of adverse weeds and if you think a particular adverse weed is too wide spread, you give up fighting it. We object to this. Invasion of and further increase of weeds, that you have given up fighting, is a side effect of timber sales. Giving up & not fighting them is a violation of the forest plan. We want thistle patches fought. We want weed patches fought, no matter how wide spread the weed is in the forest. Please use native seeds and seeds that help pollinators.

BEAVER DAM ANALOGS

We very much appreciate that you are building beaver dam analogs. We hope you build lots of them and maybe save some poles, for use in pounding into the

mud. We also wonder if spruce trees dropped across a stream would collect debris in their branches and slow water flow down for a while and sort of act like beaver dam analogs?

UNSUSTAINABLE CUTTING

We worry that the BHNF is cutting trees at an unsustainable rate. Please discuss what you think the forest's sustainable rate of cutting is and if the BHNF is meeting a sustainability goal. We will object to this project, if during the year it is logged, it contributes to a cumulative unsustainable cut at the BHNF.

ROADS & RECREATION

You need some better maps to better see the road pattern and road names. We object to new roads and it looks like the existing road density is way too intense. If you have roads that are closed in winter, but open in summer, please insure that at the road closure there is adequate space to turn around, especially in winter snow.

Please discuss the road density of the area. You need to close more roads at the end of the project and obliterate their road templates. Maybe you could create a north-south trail from some old roads and leave some large ponderosa pines yellow barks along the walk. Please evaluate the ROS Class for the area and if some management choices you could make could cause it to evolve to a more primitive and less roaded ROS. Please consider how your road re-building or maintenance will increase OHV use and increase conflict with non-motorized recreators.

When you are discussing recreation, besides hunting and driving, please also consider hiking, camping, nature study, photography, bird watching and spiritual renewal. There are other recreators besides OHVers and hunters – please respect them enough to recognize them.

SCENERY

The last SMS evaluation was done in 1996 in 3 days by Joby Timm on a computer. It was always flakey but it is now out-of-date. Please have a landscape architect re-evaluate the SMS values for the area, including the sensitivity levels and scenic attractiveness. We care about foreground values seen by a hiker -- not just the views from cars driving on interstates and state highways.

CULTURAL

Please consult with the tribes on cultural surveys and their concerns. Please insure that cultural and historic properties are properly identified and protected.

SPRINGS

Please protect springs from disturbance.

LOG LANDINGS

Please keep log landings out of beautiful places. When you burn log piles you normally leave what I call “bones” – lots of pieces of branches/logs spread around the ground, whose soil microbes may have been killed by the heat and with lots of weeds. We want a second visit to rake up the “bones” and kill the weeds. Please discuss all the small animals that make homes in the log piles that you burn to death.

CONTROLLED BURNS

We support controlled burns and thank you for planning them.

MAPS

We want a map of habitat structural stages, We want a topographical map. We want a map of roads showing which are to be reconstructed, maintained and which obliterated.

We want a map of understory thickets of baby pines that need pre-commercial thins. We want a map of the connectivity corridor for the martin. We want a map of which areas of

SS 4B and SS4C you want thinned to provide for some fire resistance reason. We want a wetlands map and a map of the montane grasslands.

Thanks,



Nancy Hilding

