Data Submitted (UTC 11): 12/25/2024 5:04:48 PM
First name: DAVE
Last name: MERTZ
Organization:
Title:
Comments: Thank you for the opportunity to comment on this project. The project area comprises about 16% of the Bearlodge RD. Thank you for presenting the recent (since 2018) timber harvesting within the project area, totaling about 7,060 acres. Combining this with the proposed 7,500 commercial treatment acres in the Fort Project, this amounts to about 46% of the project area having commercial harvesting within a relatively short period of time. How is this level of treatment sustainable long-term? When you look at the level of timber harvesting on the Bearlodge RD and the Black Hills NF as a whole, it does not appear to be a sustainable timber program.

You do not identify how much of each commercial treatment type will occur on the 7,500 acres. For instance, how many of these acres will be clearcut? With regeneration harvests such as clearcutting, you are required by the National Forest Management Act to certify that these areas have been regenerated within five years. With all of the recent clearcutting (thousands of acres) on the Bearlodge and Mystic RD's and none of them being planted to date, it seems it will be very difficult to meet this five-year requirement for regeneration. How will you accomplish this? Please be specific in your EA.

It would also be good to show how you will be managing the timber program on the Bearlodge RD for long-term sustainability, as required by NFMA. When will be the next entry into the Fort Project Area for commercial timber harvesting? It appears that it may be a very long time into the future.

Thank you for considering my concerns.