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Comments: I am a botanist by profession and worked 20 years of my career on federal public lands in western South Dakota including in the Black Hills and surrounding Northern Great Plains.

The purpose and need for the Benchmark Project isn't comprehensively or honestly described in the preliminary EA. That doesn't allow for full disclosure to the public of the impacts of the project, which is a requirement for NEPA documents.

Black Hills National Forest states in the preliminary EA that the purpose of the Benchmark project is to implement forest management actions to provide commercial timber to local industry, reduce hazardous fuels, and reduce the risk of insect infestation. Why is there such an urgent need to return to the same area that was treated less than five years ago?

Overcutting on Black Hills NF, combined with climate change, has already led to invasive species encroaching and a more open, less resilient forest structure. Scientists and conservationists warn that repeated clear-cuts can permanently alter the landscape, increase wildfire risk, and reduce biodiversity.

Some argue that removing mature trees can reduce fuel loads and lower wildfire severity. However, the Black Hills ponderosa pine ecosystem is disturbance-driven, meaning it evolved with natural fires and beetle outbreaks. Removing all trees can disrupt these natural processes, potentially making the forest more vulnerable to future disturbances. Thinning of smaller trees (non-commercial size) needs to be emphasized instead of cutting more large trees.

The timber industry sees clear-cuts as a way to maintain harvests and support local sawmills. However, recent LiDAR and field studies on Black Hills NF show the forest is already very open. This suggests that further large-scale clear-cuts may not significantly increase timber volume and could deplete the remaining standing timber inventory.

Benchmark Project proposes approximately 17,196 acres of treatment by Shelterwood Removal, Shelterwood Establishment, Group Selection, Shaded Fuel Break, hardwood enhancement and meadow enhancement, which are all "commercial" treatments. They will look very similar to a clear-cut and will be treated utilizing large equipment to cut and haul the trees. To reiterate the point, thinning of smaller trees (non-commercial size) needs to be emphasized instead of cutting more large trees.

Trees of commercial value are larger-diameter trees, typically "mature" trees. In the Black Hills, it takes over 100 years for a ponderosa pine to become a mature tree. How will Benchmark project contribute to the forest-wide structural stage goal for old growth acreage?

I am concerned that prescribed fire is included in Benchmark project but the track record on Black Hills NF is that it is rarely accomplished. An emphasis on prescribed burning needs to be made and not more clear-cuts.

I am concerned that thinning of smaller trees (non-commercial size) needs to be emphasized instead of cutting more large trees. These young trees and increased grass growth greatly increase wildfire risks.

I am concerned with the number of slash piles present today across the Black Hills NF landscape, as well as with the number of piles proposed to be generated in the Benchmark project. Weather condition/climate are clearly making it difficult for the forest to address these, and the backlog grows. These piles are a concern for wildfire risk, wildfire intensity, and soil degradation. The same locations continue to get used and at more frequent

intervals, so the soils in these areas are sterilized. Piles burned years ago can still be seen on Google Earth due to sterilized soils.

I find the rationale of mitigating fire risk not compelling for several reasons:

- * Prescribed burns on Black Hills NF almost never get done, so it's hard to believe plans for those in the Benchmark project will be a reality.
- * The Benchmark project, as proposed, will create more slash piles that amplify wildfire risks. Do not create more.
- * The real danger is in the stands of small trees that are popping up in great numbers after timber sales - they are the emergency.
- * I understand Benchmark Project will negatively impact species dependent on dense forest habitats. Dense forests in the Black Hills are now rare, and dense acres are now below what the Forest Plan requires to maintain viability of species across the forest. Logging is putting special species like goshawks and martens on the verge of being extirpated from Black Hills NF.

Underlying all the proposed actions of the Benchmark Project is a lack of respect and joint stewardship of the forest in the Black Hills for the good of the forest. In my regular explorations across Black Hills NF, I see a tired entity used by humans in so many ways, it can't keep up with rejuvenation and restoration. We humans take and take - not what we "need" but what we "want". And what we "need" should be examined - including the notion of what is "enough" and what others we share these ecosystems with require.

This isn't new thinking (reference scientists like Dr. Robin Wall Kimmerer) but maybe isn't forefront in our cash-value economy. Some other cultures have an easier grasp of Rights of Nature (Ecuadorian Constitution 2008): "Nature's Right to integral respect for its existence and for the maintenance and regeneration of its life cycles, structure, functions and evolutionary processes."

We can do things so much better, if we try.

Thank you for the opportunity to comment on the Benchmark Project preliminary Environmental Assessment.

Sincerely,
Beth Burkhart