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Comments: Roby Forest Management Plan Scoping #293810

July 15th, 2026

Mr. Todd Butler, District Ranger

Hell Canyon Ranger District

Black Hills National Forest

1019 N. 5th Street

Custer, SD 57730

RE: Formal Public Comments and Categorical Objections to the Proposed Roby Forest Management Project (Project #293810) - Hell Canyon Ranger District Scoping Period

Dear District Ranger Butler,

[1] Please accept and formally file these scoping comments, which are submitted pursuant to the National Environmental Policy Act (NEPA), the Multiple-Use Sustained-Yield Act of 1960 (MUSYA), the National Forest Management Act (NFMA), and the administrative regulations governing public participation and project planning within the USDA Forest Service. I categorically and strenuously oppose the action as proposed. I urge the agency to address the critical deficiencies, cumulative ecological impacts, and regulatory conflicts detailed below. Because the proposed action involves significant, irreversible modifications to approximately 30,000 acres of public land, I formally demand that the Forest Service prepare a full Environmental Impact Statement (EIS) rather than a mere Environmental Assessment (EA).

[2] MISUSE OF TOP-DOWN EMERGENCY DECLARATIONS TO FEED QUOTAS

The Forest Service's reliance on Section 40807 of the IIJA to fast-track commercial logging on the Hell Canyon Ranger District is a direct consequence of Executive Order 14225 ("Immediate Expansion of American Timber Production") and the subsequent USDA Secretary's Memorandum 1078-006. Bypassing standard pre-decisional objection processes under the label of an "emergency" is an egregious regulatory overreach, a legally indefensible exploitation of emergency authority, and a flagrant subversion of NEPA. By advancing a project that targets up to 10,013 acres of commercial timber harvest and 19,885 acres of secondary harvesting, the agency is treating the Black Hills National Forest as a commercial tree farm to satisfy a top-down, politically motivated timber volume increase rather than responding to a genuine, localized ecological crisis.

[3] ECOSYSTEM OVER-ALLOCATION AND HISTORICAL RECOVERY DEFICIT

The Hell Canyon Ranger District along the Wyoming border is already suffering from severe, unrecovered industrial impacts. Between 2009 and 2013, this specific project area was subjected to highly accelerated timber sales to address the mountain pine beetle epidemic. Having been aggressively logged and mined for timber resources for over fifteen years, this landscape has reached its ecological limit. The forest has had no opportunity to heal. Returning to these exact, stressed stands to execute massive commercial harvests violates NFMA mandates regarding resource sustainability and soil protection. It will permanently prevent these public lands from functioning as a healthy, resilient forest ecosystem.

[4] OBJECTION TO DESTRUCTIVE FORESTRY METHODS AND STEWARDSHIP CONTRACTS

I explicitly object to the use of an Integrated Resource Service Contract (IRSC) or stewardship contracting for

thinning within this project area. Furthermore, I categorically and strenuously oppose any "overstory removal" prescriptions. Past overstory removal in this region has historically resulted in highly dense, ecologically unproductive "doghair thickets" that increase fuel continuity. If the Forest Service proceeds with vegetation management, it must transition to uneven-aged management and individual tree selection to preserve structural diversity, rather than commercial clear-cutting that destroys multi-layered canopies and threatens biodiversity.

[5] UNADDRESSED FIRE HAZARDS OF RESIDUAL SLASH

The agency's justification that this project will mitigate wildfire hazards is biologically and historically false. The most immediate, highly volatile fuels in this district are the massive backlogs of dry, unburned machine slash piles left behind by previous commercial timber sales. Historical fires in this district-including the Danby Park and Legion Lake fires-demonstrate that high winds cause wildfires to rapidly "hopscotch" from one left-behind slash pile to another. Prioritizing new commercial harvests that generate massive new loads of activity fuels, while failing to manage the existing hazard of historical slash piles, constitutes an arbitrary and capricious failure of basic land management.

[6] MANDATORY DATA DEMANDS AND PREEMPTIVE FOIA WARNING

To satisfy NEPA's cumulative impacts requirements, the Forest Service must include the following spatial and scientific data in the draft NEPA document:

- * [A] A comprehensive map and historical log of all timber sales and commercial acres harvested within this project boundary over the last 15 years.
- * [B] An exact map showing current forest structural stages alongside a clear projection of post-treatment structural stage percentages.
- * [C] Clear disclosure of how many acres of commercial harvesting will occur on areas classified as unsuitable for timber production or on steep slopes.
- * [D] A precise mileage estimate of all temporary roads that will be constructed.

If the Forest Service fails to fully disclose this data within the forthcoming draft NEPA analysis, I will compel its release through the Freedom of Information Act (FOIA).

[7] SEVERE WATERSHED AND HABITAT DEGRADATION UNDER MUSYA

Under MUSYA, the Forest Service is legally mandated to balance five co-equal resource purposes: outdoor recreation, range, timber, watershed, and wildlife/fish. The agency is not permitted to prioritize commercial timber supply for area sawmills to the detriment of the other four mandates. The proposed reconstruction of 22.5 miles of road and the construction of new permanent corridors will cause severe soil compaction, accelerate erosion, and dump damaging sediment into fragile, ephemeral, and intermittent riparian zones. This industrial activity will also cause severe habitat fragmentation within critical big game winter ranges. The Forest Service must reconcile how its heavy industrial road and logging operations will not actively destroy the very watersheds and habitats the project claims to restore.

[8] PRESERVATION OF ADMINISTRATIVE STANDING

I am submitting these highly substantive scoping comments under my name to preserve my administrative right to formally object to any future decisions regarding the Roby Forest Management Project. Because this project threatens to permanently alter public lands that belong to all of us, the Forest Service must halt this expedited emergency process and conduct a transparent, legally compliant EIS.

Respectfully submitted,

Lily
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Cleveland , OH