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Comments: The Roby Project continues a pattern of the Black Hills NF's use of Section 40807 of the 2022 IJA and the Secretary of Agriculture's Memorandum 1078-006 to justify the continued overlogging of the BHNF. Almost the entire Forest has been designated as an emergency situation. This is in spite of the fact that the BHNF has been one of the most managed Forests in the Forest Service system for decades. The President's Executive Order 14225 - Immediate Expansion of American Timber Production, is also used to justify the continued unsustainable logging of the BHNF.

Here is the problem with all of that. I have read through all of these documents and nowhere does it say that you do not have to follow the BHNF Land and Resource Management Plan. You have clearly given up any semblance of following the Structural Stage Objectives. In MA 5.1, you are increasing SS 4A from 61.9 to 71.2%; and in MA 5.4, you are increasing SS4A from 63.1 to 74.8%. As you well know, the objective for SS 4A is 25%! To accomplish this, SS4B (which is already below the objective of 25% Forest Wide) from 25.7 to 13.5% in MA 5.1 and from 26.6 to 14.5% in MA 5.4.

All this is ironic because not that long ago, the Black Hills Resilient Landscape (BHRL) project's whole purpose and need was that the BHNF was out of alignment with the Forest Plan's structural stage objectives and there was a large need to lower the percentage of SS4A. The cure was large scale overstory removal. Now, you are greatly increasing SS4A!

Your justification for not following the Forest Plan Structural Stage Objectives is that you are following Forest Plan Amendment Phase II 2005, page III-385, Table 3-56. It appears that this table was your sole source of determining fire risk for individual stands. This table uses structural stages to determine fire risk and only looked at one factor of fire risk and that was crown fire potential. It is ironic that you feel you no longer need to pay attention to structural stage objectives from the Forest Plan but instead, you are using one table in the Forest Plan to guide your timber management going forward. I am being somewhat sarcastic here but if the only thing that mattered was lowering fire risk across the Forest, then you should transition it all to Structural Stage 1 (which is the only SS with low fire risk). I guess the McVey sales were ahead of the curve on that. We're back to the old "We've got to cut down the forest to save it."

By totally abandoning structural stage objectives, you are ignoring the plight of some wildlife species such as the American Goshawk. In your Wildlife Effects Analysis, it states "While the proposed action would protect known nest area stands consistent with Standard 3108, the lack of other suitable nesting habitat will continue to increase with this project for possible decade(s), which may not contribute toward achievement of Objective 221." Here's the question, have you decided to throw the Goshawk under the bus in the interest of getting more timber sold? Are you headed towards extirpation of the Goshawk?

There are good things included in this project, but a major concern is that many of them will never happen, while I am positive the commercial timber harvesting will happen. Here is a list (not comprehensive) of things that I don't think will happen: prescribed burning (while some may happen, it will be limited and nowhere near the acreage you are proposing), pre-commercial thinning (some will occur, but funding will be a limiting factor), planting (the Forest already is seriously backlogged on planting, thanks in a big part to the McVey projects), and most of the non-commercial treatments included due to a lack of funding.

Weed treatment is another large concern. In the Invasive Plants Effects Analysis, it states "Under the proposed action, additional management to control weeds would be necessary, and adequate funding is crucial for weed

treatments and inventory to continue throughout the project area. If budget shortfalls do not allow for post-activity weed treatments; the spread of noxious weeds may have irretrievable or even irreversible consequences." In my experience, there is never sufficient funding to address the weed concerns with these projects.

In the Silviculturist's report, it displays that since 2001, 55,309 acres of commercial management activities have occurred in the project area. Firstly, this is an incredible amount of commercial harvesting in this area! Secondly, in the preliminary EA, there is a table that says since 2006, only 16,052 acres of commercial timber harvesting has occurred. I realize that in each case, different timeframes are used but when comparing both tables there are still large discrepancies. Please explain this.

In summary, I appreciate the inclusion of the supporting documentation. There is a lot of good information there for those of us with concerns about how the BHNF is being managed, in order to better understand what is happening in these projects. I also understand the pressure the Forest is under to meet the unsustainable demands of the Region's timber industry. However, I strongly disagree with the transition of forest management into it's all about fire and insect risk. This is based on some outdated science and a Forest Plan that is very outdated. Your concentration on a couple of tables within the Forest Plan on Fire Risk and Insect Risk while absolutely ignoring the structural stage objectives (which were a result of a lawsuit and the subsequent Plan Amendment) is wrong-headed. I understand that you are claiming you are following the letter of the Forest Plan, but I would argue you are not following the spirit of the Forest Plan.

Yes, this project does not identify how much timber will be sold in a fiscal year, going forward. But we all know the intent here. It is to feed the volume sold target to continue overlogging the BHNF at an unsustainable rate. How much longer can this continue and what will be the impact down the road? What will we have left? Do the right thing. Much of the commercial logging in this project is not necessary at this time. It appears to me that you are scavenging for more timber to cut in an area that has already had a lot of recent commercial harvest activity. There are dozens of slash piles still remaining from the last entries here! Maybe you should get rid of those before you start planning new timber sales.