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Comments: The Roby Forest Management Project proposes commercial timber harvest on up to 9,677 acres and prescribed broadcast burning on up to 46,073 acres of the 49,431-acre project area, but the agency used emergency authority under the Infrastructure Investment and Jobs Act to limit this EA to only a proposed action and a no-action alternative. As stated in the Alternatives to the Proposed Action section, "no action alternatives to the proposed action have been analyzed in detail." No range of alternatives that might scale back logging, road construction, or burning intensity was ever developed or compared, even though the project spans 46,844 acres of National Forest land for an estimated 15-year implementation period.

The agency's own analysis undercuts several of its conclusions. In the Discussion section supporting Table 22, the agency admits that habitat structural stages 4A and 4B would move further from Forest Plan objectives in both management areas, not toward them, contradicting the overall claim of beneficial structural effects. Table 10 documents a "may affect, likely to adversely affect" determination for the threatened northern long-eared bat, including potential harvest of roost trees and disruption of hibernation, without explaining how this squares with a finding of no significant impact. The Soil Productivity section discloses that "soil disturbance monitoring has not occurred recently in the project area," yet the EA still concludes the project will not approach the Forest Plan's 15 percent detrimental disturbance threshold, and the Non-native Invasive Plants section projects that non-priority weeds could increase to as many as 4,400 acres.

I urge you to halt the fast-tracked execution of this project for the following critical reasons:

* Unsustainable Over-Logging: The project area-located west of Custer along the Wyoming state line-covers roughly 46,844 to 49,431 total acres and calls for intensive timber harvesting and tree removal across a staggering percentage of the terrain. This landscape has already sustained heavy timber sales and features extensive, fresh slash piles from recent cuts. Layering more extraction on top of an already overcut forest is deeply irresponsible.

* Failure to Protect Old-Growth and Ecosystems: The Black Hills National Forest has seen a precipitous decline in its natural old-growth stands, which currently sit far below the original forest plan targets. Bypassing comprehensive environmental studies risks destroying the remaining old-growth, clearing out vital wildlife corridors, and accelerating soil erosion and watershed damage.

* Misguided "Emergency" Fast-Tracking: Using broad federal emergency situation determinations to bypass thorough National Environmental Policy Act (NEPA) and Endangered Species Act (ESA) reviews strips the public of its right to oversight. It also risks violating essential tribal sovereignty agreements meant to protect these sacred lands. Prescribed burning and aggressive clearing over such a massive footprint require rigorous, long-term scientific analysis, not expedited industrial exploitation.

The Black Hills National Forest cannot withstand this level of accelerated pressure. I ask that the Forest Service cancel the commercial logging and broad-scale burning mandates under the Roby Project, and instead pivot toward an open, collaborative management strategy that prioritizes true ecosystem restoration and honors the biological and cultural heritage of this region.

The agency should prepare or meaningfully analyze a genuine range of action alternatives rather than relying solely on the emergency exemption, reconcile the admitted divergence from Forest Plan structural stage objectives with its beneficial-effects conclusion, disclose the full biological analysis supporting the northern long-eared bat and migratory bird determinations, conduct current soil disturbance monitoring before finalizing threshold conclusions, and complete cultural resource inventory and tribal consultation for the entire project area, including the southern portion, before signing a decision.

Thank you for your time