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February 20th, 2025

Patrick Champa, District Ranger
Elizabeth Krueger, Resource Planner
Bearlodge Ranger District,
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Submitted via <https://www.fs.usda.gov/project/blackhills/?project=6554>
and/or to elizabeth.krueger@usda.gov

Comments on - North Sand Forest Management Project #65540 (the Project)

Dear Forest Service Staff,

Thanks for the opportunity to comment on this Preliminary Environmental Assessment. Your on-line comment page, located at URL <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65540> was not working on the evening of 2/20/2025, which it should be, as it is within the 30-day comment period. Thus, we are sending these comments directly to Elizabeth Krueger.

Habitat Structural Stage 5 (old growth).

The preliminary EA lacks disclosure of current structural stages within the project area and across the district. It generally states that some of the structural stages will remain the same.

The North Sand Forest Management Project is proposing harvest treatments that will involve alteration of Habitat Structural Stages (HSS). We fear this will continue a trend across the Black Hills National Forest to divert structural stages away from the Goals and Objectives in the Forest Plan. The last precepts of HSS we saw for HSS distribution in the dominant Management Areas, showed HSS 5 at .5 percent when it should be 5%.

We are especially afraid of a further loss of HSS 5 stands or of older HSS 4C or HSS 4B stands that could be considered high quality replacement stands, likely become future HSS 5 stands, relatively quicker than other mature pine stands. The area surrounding the Sand Creek Inventoried Roadless Areas was a RARE II Roadless Area into the 1980s and we think it existed in a relatively unlogged state much later in time, when compared to much of the Black Hills National Forest. It has had larger yellow bark pines, remaining in greater abundance, than the much of the rest of the Forest.

We object to modifying mature structural stages in a landscape, when such conversion would be violating the Forest Plan structural stage distribution objectives.

If the North Sand Forest Management Project continues forward with the vegetation treatments as described, the project would be in clear violation of the National Forest Management Act of 1976 and MUSY of 1960.

Species Viability and Northern Goshawk as a Management Indicator Species (MIS)

The Northern Goshawk is both an MIS and a sensitive species for the Black Hills National Forest. The Black Hills National Forest is legally obligated to ensure that ample habitat will be conserved to minimize the potential for federal listing of this species, meaning that the Forest Service is obligated to provide habitat for the Northern Goshawk and its prey. The Bearlodge Ranger District has historically contained high quality nesting habitat for the Northern Goshawk.

Habitats, and specifically nesting habitat, for Northern Goshawk have been and are declining in availability in the Black Hills National Forest. The remaining high-quality habitat has become increasingly fragmented. Given the loss of high-quality habitat and

limited data documenting Goshawk use of lower-quality habitat, the BHNF may be moving away from management objectives established to ensure Goshawk population viability.

Draft EA says treatments won't occur within in the nest stands. However increased loss of mature HSS will reduce the potential replacement stands available in case of fire, disease, insects, extreme weather, recreation and/or future logging remove any existing nest stands. Furthermore, the North Sand project may have other viable nest stands that are not currently being used by goshawks. If these are destroyed by logging, then the option to support an increased density of goshawks in the project area would be precluded.

The North Sand Forest Management Project includes 11,062 acres of commercial harvest that will continue to push mature stands away from stand structure that would serve as critical nesting and foraging habitat for the Northern Goshawk, a Management Indicator Species and a R2 Sensitive Species. If the commercial harvests continue as proposed, then this project will be in direct violation of NFMA, Code of Federal Regulations, and agency policy.

Sustained Yield

This Preliminary EA does not make clear what volume of timber will be sold through the commercial harvests planned. With no disclosure of how much commercially treating 11,062 acres will contribute to the annual volume sold on the Black Hills National Forest and thus to the ASQ, we can only fear this project will contribute to The BHNF's unsustainable annual cut, that is occurring each year at the Black Hills National Forest and thus help the Forest to violate NFMA and MUSYA.

Old growth Definitions

The Preliminary EA at page 2, offers this description of Old Growth:

"Old growth pine stands exist in management area 3.7 and elsewhere. Based on published descriptions for old growth pine forest in the Black Hills, characteristics of these stands include presence of at least 10 live trees per acre with a diameter of at least 16 inches and age of at least 160 years, along with a component of dead, broken, or deformed trees." Management area 3.7 is Late Successional Forest Landscapes.

The Preliminary EA does not include a citation for these "published descriptions". Please include such citations in the final EA. We doubt that 10 large diameter trees per acre was typical of historic old growth stand and think that the average distribution of large diameter trees, in such stands, was much greater than 10/acre. Quotes from Graves would indicate timber sales in the old days, were cutting lots of large diameter yellow barks.

The Forest Service choosing to allow such a lower number of large trees/acre will allow them to designate stands with few large yellow barks as old growth and thus assure more large diameter pine trees are available to cut on this Forest. Did the 3.7 Late Successional Forest Landscape that was designated in the Project area during the Forest Plan in 1996, have so few large diameter old yellow barks per acre?

There is no definition of “old growth” in the Forest Plan Glossary. There is a definition of “late succession” in the Forest Plan’s Glossary at page 38. It is:

“Late Succession

Ecosystems distinguished by very large old trees and related structural features (Mehl 1992). This term encompasses the later stages of stand development that typically differ from earlier stages in structure, composition, function, and other attributes.

There are two types of late-successional ponderosa pine defined for the Black Hills. The first type, open-canopy late-successional ponderosa pine, occurs where periodic, low intensity fires have been part of the ecosystem. These late-successional stands would consist of clumps or groups of trees with grasses in the openings between the clumps. They would contain large old trees with open branches, irregular, and flattened crowns. The clumps or groups of trees would contain little down dead material and few small trees.

The second type, closed-canopy late-successional ponderosa pine occurs where periodic, low-intensity high-frequency fires have not been a significant part of the ecosystem. These stands would contain large old trees with open branches and irregular crowns. The stands would have multiple canopy layers made up of various-aged trees. They would be well stocked with trees and contain standing dead and down trees.” (Emphasis added).

There is also a definition of Structural Stage 5 at page 68 of the Forest Plan’s Glossary:

“Structural Stage 5 (Late Succession): This structural stage is characterized by very large trees (16+ inches DBH). Trees are at least 160 years in age; ponderosa pine that reach this age are commonly referred to as “yellow barks.” Late succession ponderosa pine may occur in dense stands, but may also grow in the open or in “parklike” stands (Mehl 1992).” (Emphasis added).

We believe allowing stands with just 10 large diameter trees per acre to be called “old growth” is not consistent with and a violation of the Forest Plan’s definitions.

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Tentatively suitable lands

The Preliminary EA says at page 9:

“Old Growth Pine and Management Area 3.7

The project area contains 1,380 acres of old growth pine, including 244 acres in management area 3.7. Variable density commercial thin is proposed on 88 acres of old growth in management area 3.7. In other management areas, commercial thin is proposed on 171 acres of old growth. Thinning prescriptions in old growth would focus on removing trees from the lower crown classes to favor the larger, dominant trees. These stands are currently vulnerable to stand-replacing fire due to uncharacteristically high density and the presence of tall, crowded pine saplings, juniper, and accumulations of dead and down fuels.”

The Forest Plan’s Management Area Standards and Guidelines for Management Area 3.7 says:

“3.7-2102. Tentatively suitable lands within these areas, including the “suitable-not scheduled” lands in the Sand Creek area, do not contribute to the allowable sale quantity and are not part of the suitable timber land base. STANDARD”

Where are the tentatively suitable lands in the Sand Creek 3.7 area? Have you verified that the 88 acres in which you plan commercial timber sales, are not in the part of Sand Creek’s 3.7 Management Area, that do not contribute to the ASQ and are not part of the suitable timber land base?

Weeds

In your Noxious Weeds Analysis at page 5, you indicate that Canada Thistle – has an estimated 750 acres, that are not mapped and that they are widespread and it occurs throughout the planning area. They are also a class C species. Nancy Hilding, who is writing this comment letter, has seen large thistle thickets that look like they are on what was once a log landing or other disturbed places. We are not sure how your plan at page 11, is going to handle large patches of Canada thistle (which are a class C species, not a class A or B species) and prevent them from spreading and becoming established in new areas of disturbance. All your mitigation on page 11 are for class A and class B weeds.

The EA at page 11 says:

“1) Where ground-disturbing activities occur in areas infested with Class A or B noxious weeds (see Appendix A of Weed Report), treat weeds prior to project implementation, where feasible, to reduce seed source, future spread, and additional establishment. Monitor and treat weeds post-disturbance.

2) If any substantial (more than 0.25 acre) ground disturbance occurs within or in the immediate vicinity of known infestations of Class A or B species, treat and/or monitor

these areas for three to seven years post-disturbance to mitigate weed spread and establishment“ etc.

In the Noxious Weeds Analysis it says “Noxious weeds are divided in 3 different classes as defined by the Black Hills Invasive Plant Partnership (Appendix A): Class C: Invasive plants that are established in the region. Containment of established areas and suppress smaller isolated patches through integrated management tactics (herbicide, mechanical, biological control).”

We want to know what your plan for class C weed species specific to this project are. If you are just giving up on them in North Sand Project or allowing them to spread with each timber sale, this must be disclosed as a serious harm and perhaps a cumulative impact forest wide from many logging proposals. It is also a violation of the Forest Plan standard and guidelines:

4301. *For all proposed projects or activities, determine the risk of noxiousweed introduction or spread, and implement appropriate mitigation measures and treatment.
STANDARD

Thanks,

A handwritten signature in black ink, appearing to read "Nancy Hilding", with a stylized flourish at the end.

Nancy Hilding, Sara Johnson and Dagny Signorelli