

Dear Interested Party:

The Forest Service is currently seeking public comments for the Elk Bugs and Fuels Project on the Northern Hills District of the Black Hills National Forest. The information in this letter is provided to help you understand the history of the project area, the present condition, and the objectives for management.

We ask you to review the proposed activities and to let us know if you have any comments or suggestions concerning this management proposal.

Project Location

The Elk Bugs and Fuel Project (see attached vicinity map) is located on the Northern Hills District of the Black Hills National Forest in South Dakota. The area contains approximately 45,498 acres of National Forest land and 15,068 acres of interspersed private and state lands and is located southwest of Sturgis, South Dakota in townships 3 North, 5 East; 3 North, 6 East; 4 North, 3 East; 4 North, 4 East; 4 North, 5 East; 4 North, 6 East; 5 North, 3 East; 5 North, 4 East; and 5 North, 5 East, Black Hills Meridian.

Background

Mountain pine beetle populations have been increasing in the Black Hills over the last 5 years. In 1999, 2000, and 2001 aerial surveys indicated a large mountain pine beetle infestation in the Beaver Park area on the Northern Hills Ranger District. Three years ago nearly 70% of the forested land in the Beaver Park area was classified in the moderate to high stand susceptibility to infestation category. There have been no treatments in the Beaver Park Lawsuit Settlement Area and mountain pine beetle attacks have spread to other locations within the project area. There are epidemic mountain pine beetle populations and associated high levels of tree mortality scattered throughout the project area.

In the fall of 1998 and spring of 1999 the area received heavy wet snow combined with winds that caused damage to trees across much of the analysis area. The broken top trees provide suitable habitat for mountain pine beetles and the broken tops increase fuel loading for potential wildfires.

Wind and snow damage, combined with the effects of tree mortality due to mountain pine beetle infestation, could create fuel conditions that will not allow fire suppression forces to meet the suppression objectives in the LRMP. The potential for a catastrophic wildfire event may increase with further mountain pine beetle infestation.

The areas of mountain pine beetle infestation and snow-damaged timber are in the proximity of three watersheds: Fort Meade VA Hospital Watershed, Sturgis Experimental Watershed, and Sturgis Community Watershed.

On August 2, 2002, the President signed P.L. 107-206. Section 706 of the Act authorized the Secretary of Agriculture “to undertake actions to address promptly the risk of fire and insect infestations; . . .” [Section 706(b)(1)] A copy of the pertinent sections of P.L. 107-206 is

available for review at the Northern Hills Ranger District office in Spearfish, South Dakota. The following is a summary of activities approved by the Act:

“ . . . the Secretary is authorized to treat additional timber within or outside the existing cutting units for the Piedmont, Kirk, Redhill, Cavern, Deadman, Danno, and Vanocker timber sales and within the analysis areas for these sales as is necessary to reduce beetle infestation and fire hazard;” [Section 706 (c)(1)] The Act then gives details of the criteria to be used in implementing the additional treatments.

Skid trails “ . . . shall be restored to pre-existing conditions upon completion of treatment activities.” [Section 706(c)(4)]

Buffer Zones. “The Secretary is authorized to reduce risk to private property adjoining the Black Hills National Forest by treating insect infested trees, dead trees, and downed woody materials in T5N, R5E, BHM, Section 35, and T4N, R5E, BHM, Sections 1, 2, and 12 within 200 feet of adjacent property.” [Section 706 (d)(1)]

Additional Treatments. “The Secretary is authorized to treat for insects and fuel reduction National Forest System lands within ¼ mile of private property and other non-National Forest System lands near the community of Sturgis, and shall include, where feasible, the following locations:”

T5N, R5E, BHM Sections 35, 27, 21, 20, and 18. [Section 706(d)(2)(A)]

T5N, R4E, BHM Sections 13, 11, 2, 3, and 4. [Section 706(d)(2)(B)]

Fuel Breaks. “The Secretary shall establish 400-foot fuel breaks as depicted on the map entitled ‘Beaver Park Fuel Breaks and Fuel Treatment Areas’, dated June 11, 2002” [Section 706(d)(3)] See the enclosed map for the location of the fuel breaks authorized by the Act.

Section 706(d)(4) states that all of the activities discussed above that are outside of the Beaver Park Roadless Area shall be limited to no more that 8000 acres of National Forest System land, pending issuance of a decision on this (Elk Bugs and Fuel) project.

Section 706(d)(5) authorizes the Secretary to treat not more than 700 acres within the Forbes Gulch area in order to reduce concentrated heavy fuels. The treatments shall not involve commercial timber sales or road construction, except that the Secretary may permit firewood cutters to remove the timber without construction of any roads.

Additional activities authorized by the Act include improvement of Forest Roads 139.1, 169.1b, 169.1d and 139.1b. The improvements will be minimal in accordance with Section 706 (e)(2).

Section 706(e)(4) authorizes the Secretary to construct two 5-acre helispots within the Beaver Park Roadless Area to transport firefighters and fire equipment into and out of the area.

As stated above, this is only an excerpt from P.L. 107-206. There is more specific information in the Act, but this summarizes most of the activities approved for implementation. Section 706(k) of the Act states, in part, that “. . .the Secretary shall disclose the effect of actions authorized by this section in the proposed Elk Bugs and Fuels

project cumulative effects analysis for past, present, and reasonably foreseeable future actions.”.

Purpose and Need of the Proposal

The Purpose and Need for action in the Elk Bugs and Fuel Project area is based on the Black Hills National Forest Land and Resource Management Plan (LRMP) and analysis of mountain pine beetle activity completed by Region 2 Forest Health Management Staff. This project proposal is designed to move the area from its existing condition towards the desired future condition as described in the LRMP. The Purpose and Need is to reduce mountain pine beetle populations in pine stands, decrease the risk and hazard of wildfire in the proximity of private lands and homes, and to reduce the susceptibility of vegetation to catastrophic fire and further mountain pine beetle attacks. The following “needs” have been identified in order to accomplish the purpose and need:

1. Mountain pine beetle populations have reached epidemic levels. Stand conditions are conducive to sustaining continued high levels of beetle caused mortality. Wind and snow damage combined with tree mortality due to mountain pine beetle infestation have created fuel conditions in excess of Forest Plan objectives. Therefore, there is a need to reduce the susceptibility of vegetation to uncharacteristically intense wildfire and outbreaks of mountain pine beetle (LRMP I-9).
2. There is a need to cooperate with the South Dakota Division of Forestry, Community of Sturgis, and other private entities in efforts to decrease the risk of a mountain pine beetle outbreak that could affect the Sturgis Community Watershed, private lands, and homes. Beetle control efforts are taking place within the Sturgis Community Watershed and private lands. Beetle control on National Forest lands in the vicinity of this watershed is important to the success of control efforts taking place on adjacent lands. (LRMP Goal 7)
3. Since mountain pine beetles are at epidemic levels throughout much of the project there is a need to reduce beetle populations in affected stands. (LRMP Guideline 4205)
4. Since P.L. 107-206 did not authorize treatments adjacent to all areas of private lands and homes within the project area, there is a need to reduce the susceptibility to catastrophic, high intensity wildfire in the proximity of these areas. (LMRP I-9)
5. There is a need to disclose the effect of actions authorized by Section 706 of P.L. 107-206, except for subsections (f)(1) and (g), in the cumulative effects analysis for past, present, and reasonably foreseeable future actions. [P.L. 107-206 Section 706 (k)]
6. In most cases, the natural succession of hardwood stands, in the absence of fire, moves towards ponderosa pine or white spruce. Hardwood stands are generally less

flammable and burn less readily during wildfire. Therefore, there is a need to maintain or enhance the existing hardwoods by removing conifers. (Objective 204)

7. Congress has recognized the importance of sustainable commodity use in laws including the Multiple-Use Sustained Yield Act, Sustained-Yield Act, the National Forest Management Act, and the 1872 Mining Act. There is a need to emphasize long-term production of commodities for economies, communities and people in an environmentally sound manner. (LRMP I-17; Objective 303)
8. There is a need to provide an adequate transportation system for both the short- and long-term access for the management of the National Forest lands within the Elk Bugs and Fuel project area. Investments to the existing Forest Service road system are needed to maintain or improve the safety or operating efficiency of roads. Where there is a need to initiate vegetative treatments and adequate access does not exist, investments in new roads are needed.

Poorly maintained roads, improperly located roads, or roads no longer needed can have adverse effects on watersheds. There is a need to ensure that the transportation system within the project area will not degrade water quality. Opportunities exist to maintain and enhance water quality by eliminating roads no longer needed for management purposes. (Objective 309)

Proposed Actions to Meet Purpose and Need

Forest Plan Amendments

The Black Hills National Forest proposes to disclose the effects of four nonsignificant Forest Plan Amendments. These Forest Plan Amendments are needed because of changed conditions brought about by mountain pine beetle infestations and the associated potential for catastrophic wildfire events. The proposed amendments to the Forest Plan, if approved, would apply only to the Elk Bugs and Fuel Project.

Forestwide Standard 3202, General Wildlife and Fish Direction. This standard provides for big game screening along 20 percent of the edges of arterial and collector roads. Providing shaded fuel breaks along roads in order to protect resources from potential wildfires will require that this standard be reduced to approximately 14 percent for the project area.

Management Area (MA) 5.4, Big Game Winter Range Emphasis. MA 5.4 Objective 205 provides for thermal cover for elk, deer and winter turkey habitat on at least 20 percent of the forested portions of the management area. MA 5.4 Standard 2101 states that thermal cover should not be harvested if the planning unit does not meet Objective 5.4-205. In order to maintain the health of many of the insect infested stands, it is necessary to reduce the basal area so that the remaining healthy trees can better withstand insect attacks. Reducing the basal area of some of these stands will decrease their effectiveness in providing thermal cover. It is therefore necessary to temporarily lower the 20 percent standard within the project area to

approximately 14 percent until the stands are treated, recover, and grow to a density that will provide thermal cover in the future.

Management Area 5.4, Big Game Winter Range Emphasis. Standard 5.4-3203 states that deer and elk habitat effectiveness should at least meet the following values:

Elk Summer = 54 percent	Deer Summer = 45 percent
Elk Winter = 47 percent	Deer Winter = 46 percent

In order to meet the purpose and need of this project proposal, it will be necessary to amend the Forest Plan, Standard 5.4-3203 to the following approximate values:

Elk Summer = 47 percent	Deer Summer = 44 percent
Elk Winter = 42 percent	Deer Winter = 40 percent

Management Area 3.31 Back Country Motorized Recreation Emphasis. Standard 3.31-3202 states that deer and elk habitat effectiveness should at least meet the following values:

Elk Summer = 40 percent	Deer Summer = 37 percent
Elk Winter = 35 percent	Deer Winter = 33 percent

In order to meet the purpose and need of this project proposal, it will be necessary to amend the Forest Plan, Standard 3.31-3202 to the following approximate values:

Elk Summer = 32 percent	Deer Summer = 28 percent
Elk Winter = 28 percent	Deer Winter = 25 percent

Project Proposals

The proposed actions to meet the purpose and need of this project are listed in the following Table and discussion:

Table 1. Proposed Treatments and Activities		
Treatment	Amount	Units
Commercial Hardwood Restoration	409	acres
Non-commercial Hardwood Restoration	144	acres
Commercial Thinning	10,348	acres
Non-commercial Thinning	3,282	acres
Commercial Thinning and Bait and Sanitation Cutting	434	acres
Prescribed Burn	562	acres
Bait and Sanitation Cutting	126	acres
Shaded Fuel Breaks	2,745	acres
Transportation Activities *		
New Road Construction	42.9	miles
Reconstruction	33.9	miles
Decommission Existing Roads	63.5	miles

*See Transportation Activities discussion below for definitions of road activities

Note: No treatments are proposed by this project proposal within the Greater Beaver Park Lawsuit Settlement Area, including the Beaver Park roadless area.

Vegetative Treatments

Thinning (Commercial and Non-commercial) - Conifer stands would be thinned from below to half of their existing stocking. Thinning increases tree vigor for the remaining trees and reduces stand susceptibility to insect attack. Thinning from below would remove the smallest trees in the stand and retain the largest dominant and co-dominant trees. This creates stand conditions that are less likely to experience a beetle outbreak.

Where topography and access allow, thinning trees of commercial size (6 inches DBH or greater) would be accomplished through commercial timber sale contracts. Merchantable trees would be cut and removed. Areas with no access, or ground conditions too rugged for logging equipment, would be thinned and the trees would remain on-site (non-commercial). In most cases, stands thinned by commercial logging contractors would need follow-up work to thin the smaller, non-merchantable trees.

Hardwood Restoration - Selected stands would be treated to maintain or enhance the existing hardwoods by removing conifers. Hardwood stands are generally less flammable and burn less readily during a wildfire, so it is desirable to maintain these stands, especially near private lands and homes. In most cases, the natural succession of hardwood stands, in absence of wildfire, is to ponderosa pine or white spruce. Ponderosa pine and/or white spruce will often take over a hardwood stand with time and the absence of wildfire.

Sanitation Cutting - Sanitation involves treating pine trees currently infested with mountain pine beetles prior to beetle maturation and emergence. This treatment reduces mountain pine beetle populations in local areas, and merchantable timber can be salvaged in some cases. Mountain pine beetles usually attack trees from early July through mid-September. The freshly attacked trees can be cut and processed at a sawmill, or cut and treated on site to kill the beetle larvae that are just under the bark. This work can start in the early fall, but must be completed before the beetles start flying in July. Forest workers must carefully search an area for beetle-infested trees, looking for pitch tubes, signs of woodpecker activity, or boring dust at the base of trees. Once the trees are located and marked, logging crews or contract fellers would return to salvage or treat the infested trees.

Bait and Sanitation Cutting/Commercial Thinning, Bait and Sanitation Cutting - Mountain pine beetles can be lured into an area with pheromone bait. Mountain pine beetles would attack the baited trees and adjacent trees. In the fall, winter, and spring, baited trees would be cut and processed at a sawmill to kill the beetle larvae. This treatment would be used to increase the effectiveness of sanitation cutting. Beetles could

be lured to areas where sanitation efforts could readily take place. The local beetle population would determine the amount of tree mortality at any one baiting site. This treatment reduces mountain pine beetle populations in local areas and merchantable timber can be salvaged. Some stands would be commercially thinned in addition to the bait and sanitation treatment.

Shaded Fuel Breaks - Fuel breaks will consist of thinning the overstory trees to 15-20 feet between the crowns. Understory conifers will be removed. Surface fuels will be removed or intensively treated. The conifers left within the fuelbreak will have the branches pruned up to 10 feet from the ground. The dimensions for the fuelbreaks will be up to a distance of 200 feet on each side of the road surface edge.

The vegetative treatments will produce an estimated timber volume of 18 to 19.5 million board feet.

Transportation Activities

New road construction is proposed on approximately 42.9 miles within the project area. Road construction is proposed for both short and long term management of National Forest system lands. Note: road construction on private land is contingent upon obtaining road right-of-ways.

Road reconstruction is defined as an activity that results in improvement or realignment of a road. These investments in construction activity raise the traffic service level of a road or improve its safety or operating efficiency. Realignment results in a new location of an existing road or portions of existing road and treatment of the old roadway. Activities are proposed to minimize sediment runoff and provide safe driving conditions.

Approximately 63.5 miles of roads are proposed for decommissioning. Decommissioning is defined as activities that result in the stabilization and restoration of unneeded roads to a more natural state. There are five levels of decommissioning. They range from road being 1) blocked 2) revegetated 3) culverts removed 4) unstable fills removed or 5) roadbed is recountoured. Almost all of the roads proposed for decommissioning are non-system “two track” roads that developed through public use over time.

Preliminary Identification of Issues

The following list of preliminary issues was developed for the project area by the Forest Service Interdisciplinary team (ID team). This list was developed after review of issues from the Veteran/Boulder Project Area, participation at public meetings on mountain pine beetle sponsored by the South Dakota Department of Agriculture Resource Conservation and Forestry Division, and consideration of Agency concerns and opportunities. General categories have been used to focus on key topics; however, this list will be amended and/or expanded after review of the Elk Bugs and Fuel public comments. During the analysis, alternatives to the proposed action will be developed which respond to the final list of issues. In response to the issues, the alternatives developed may include different levels of activity and may include different prescriptions.

1. Road management - The Forest Service will complete a Roads Analysis for the Elk Bugs and Fuel Project, which includes evaluating all roads in the project area for effects to the ecosystem.

The proposed action requires examining the road system to determine if the existing road system is adequate (or if improvements are needed), and if any roads need to be closed for resource protection or other reasons (e.g., water quality, wildlife, or recreation opportunities).

2. Mountain pine beetle and forest health - The spread of mountain pine beetle attacks has caused a concern that there could be large-scale mortality if these areas are not treated.

3. Prescribed burns, fuels, and wildland-urban interface - there is a concern for an increased potential for wildfires where there are large areas of unmanaged forest, or where mortality from mountain pine beetle infestations has increased fuels.

4. Wildlife habitat -As evidenced by the proposed Forest Plan Amendments, wildlife habitat will fall below present Forest Plan Standards in several areas. The Proposed Action was developed by weighing the potential effects of the proposed treatments to wildlife habitat against the on-going loss of wildlife habitat through mountain pine beetle attacks plus the potential effects of the increased risk of catastrophic wildfire events. This issue will be fully explored in the environmental impact statement.

Commenting on the Elk Bugs and Fuel Proposal

We are interested in your comments, suggestions, and recommendations for achieving the purpose and need for the Elk Bugs and Fuel project. Your concerns and comments become part of our analysis as we identify those issues that may lead to changes in the existing proposed action, develop alternatives, or develop mitigation measures to be applied during implementation. Please review the Purpose and Need for the Proposal section of this letter. Comments that fall within the scope of the project as described in this section are helpful to us as we develop issues. We encourage you to tell us what you know about the area. Site-specific comments are most helpful when trying to narrow and address the public's issues and concerns. Try to phrase comments so that they describe your concern or issue in a "cause and effect" relationship as specifically as possible for the proposed action. For example, "Don't build new roads" is not site-specific to the project. A more specific comment would be: "I oppose road building in the XX Project, because the sedimentation produced would harm the spawning habitat of the XX".

As discussed in "Need" statement number 5, this project will evaluate the cumulative effects of activities approved by Section 706 of P.L. 107-206. The attached map shows approximate locations of the implementation of the activities approved by P.L. 107-206. The approved treatments are currently being designated on the ground and the exact locations are subject to change. Comments will be accepted regarding the cumulative effects of these approved treatments.

More detailed maps of both the Proposed Action and cumulative effects area are available at the Northern Hills Ranger District office in Spearfish, South Dakota.

Written comments are preferred. However, if you prefer to discuss this project personally, or if you would like more information, please contact Carl Leland, Interdisciplinary Team Leader, at

(814) 772-2028. Comments should be received by December 16, 2002 to be most useful. Submit written, oral, or e-mail comments by:

(1) Mail- "Elk Bugs and Fuel", Carl Leland, US Post Office, 18 South Mill Ave, Room 201, Ridgway, PA 15853;

(2) Phone- 814-772-2028;

(3) E-mail- cleland@fs.fed.us (please note: when commenting by e-mail be sure to list ***Elk Bugs and Fuel*** on the subject line and include a US Postal Service address so we may add you to our mailing list).

A copy of this letter and attached maps are also available on the Black Hills National Forest website at www.fs.fed.us/r2/blackhills/rr/enviro/docs.

Thank you for your time and interest in your National Forest.

Sincerely,



PAMELA E. BROWN
District Ranger

Attachments: 3 maps

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