



Findings on the Phase II Forest Plan Amendment July 20, 2005

The BHNFAB reviewed proposals and offers the following findings to the BHNF supervisor regarding the Phase II Amendment to the Land and Resource Management Plan. This report is based on review of documents, data, and statements provided by BHNF staff and Phase II interdisciplinary team members to date. (See Appendix A) . This report addresses two of the three Phase II issues: forest diversity/species viability, and fire/insect management. The issue of Research Natural Areas (RNA) is deferred and open to discussion by the Board and discretion of the Forest Supervisor at a later date.

The BHNFAB supports the general approach of the Forest Service's Phase II Amendment to provide for species viability and fire and insect hazard reduction. By establishing a greater diversity of forest structures across the landscape, Forest Service objectives may be met. The Board is mindful that the best of plans are just so much paper without sufficient funding. Securing adequate funding to fully implement the Phase II Decision is essential. (See Appendix B)

FINDING 1:

Forest Diversity / Species Viability

Forest diversity and species viability are complexly related. Tree surveys show the Black Hills National Forest has an over abundance of middle-aged (80-110 year-old) ponderosa pine trees, many of which are overcrowded. (See Appendix C) There is a deficiency of grass-forb/young forest and large tree/old forest conditions and characteristics.

The Board finds: (1) As compared to current conditions, a greater diversity of forest structures and types, including pine, meadow, hardwood, and riparian is needed; and (2) The Forest Service's general concept of habitat structural stage and diversity objectives across the Forest is a reasonable approach to provide for species viability.

FINDING 2:

Fire / Insect Management

The Board is aware of the interaction between large disturbance events and the many management objectives of the Forest (including species viability, timber harvest, recreation, scenic values, water quality, soil productivity, historic and cultural resources, and the socio-economic fabric of the Black Hills region). Exacerbated by fire exclusion and persistent drought conditions, overcrowded trees have led to an increase in the size, intensity, and severity of insect and wildfire events. There is consensus on the Board that a significant change is necessary in the 1997 Revised Forest Plan direction concerning the management of these interactions.

The Board finds: (1) A significant change in the 1997 Revised Forest Plan is needed to address large disturbance events and forest management objectives; (2) More diverse forest conditions could reduce the severity of wildfire and insect events and improve management response to these events; and (3) Fire and insect management is a high priority across the Forest, especially within the wildland-urban interface.

Appendices A - C attached.

Approved by the National Forest Advisory Board on July 20, 2005

Appendices to NFAB report on the Phase II Forest Plan Amendment

Appendices A-C are attached per agreement that subcommittee members may submit individual opinions and statements that are not included within the broad subcommittee consensus. No other reports were submitted for inclusion in the Appendix.

Appendix A-1: Documents, data, and staff statements

[\(Website document submitted by subcommittee Chairman Bob Kloss\)](#)

Appendix A-2

(submitted by Aaron Everett)

The discussions entertained during the Subcommittee's review of Forest Service included the list of items determined to be outside the Scope of the Phase II analysis. Among the items discarded from consideration was 'that the Forest harvest levels of timber which would exceed the Allowable Sale Quantity.' The Allowable Sale Quantity (ASQ) is a planned level of timber harvest calculated, in the context of meeting all other management objectives, over the 10-15 year life of the Forest Plan. The current Forest Plan ASQ is 838 million board-feet (MMBF) per decade, commonly talked-about in an annualized fashion as 83.8 MMBF. The Forest Service has decided in Phase II that the ASQ will not be reanalyzed, and will therefore remain the same. To my knowledge, no one has suggested increasing the ASQ.

However, in the first eight years of implementing the 1997 Plan, the Forest Service has experienced a cumulative deficit in ASQ accomplishment on the order of 230 MMBF. What has been suggested, in the Healthy Forest Alternative and in individual comments, is that the Forest Service state within the Phase II decision its intent to make-up all or a portion of this shortfall as part of the Forest's strategy to accomplish forest health and diversity objectives. The Healthy Forest Alternative, for instance, analyzed a harvest level of 112 MMBF annually over the anticipated seven-year life of Phase II. In order to estimate the long-term effects of such a strategy, the analysis extended its projections several hundred years into the future as well.

While an 112 MMBF level of harvest would not make-up the ASQ shortfall in its entirety, the results of the analysis were telling. The analysis disclosed that such a program of management would substantially reduce the predicted risk of mountain pine beetle infestation as well as the risk of large and intense wildfires. This strategy was also demonstrated to enhance forest structural diversity over the near- and long-term in a fashion which would, in turn, maintain or enhance the diversity and viability of wildlife populations. As the preceding are key objectives established within the Scope of the Phase II decision, it would be unwise for the Forest Service to cast aside such a strategy without thorough consideration. My recommendation is therefore that the Forest Service avail itself of the opportunity to better accomplish management objectives by recovering all or

a portion of the ASQ shortfall in the latter-half (post-Phase II) of the Plan implementation.

A vibrant forest products industry in the Black Hills serves both as an important contributor to local communities and economies, and as the Forest Service's primary tool with which to accomplish land management objectives. The outcome of the Phase II Amendment will directly determine the persistence or exorcism of this infrastructure in its current configuration. My recommendation is therefore that the Forest Service select an Alternative which does not jeopardize, and indeed makes provisions for, the future of the existing Black Hills forest products industry infrastructure.

Clearly, the long-term success of fuel reduction and forest health treatments, which remove primarily low-value small trees and dead trees/limbs/brush from the forest floor, cannot rely entirely upon Congressionally appropriated funds. I therefore also recommend that the Forest Service select an Alternative which will encourage and enable the development of new elements of infrastructure, complimentary to those existing, which are better able to manufacture and add value to products from small-diameter trees and other biomass material.

Both of the preceding recommendations are well within the Scope of the Phase II Amendment. They represent elements of the decision over which the Forest Service has control, and will weigh heavily upon the success or failure of Phase II's implementation.

APPENDIX B - Economics

(submitted by Aaron Everett)

The BH Forest Resource Association is well acquainted with the necessity of adequate funding levels in successful implementation of the Forest Service's various programs of work. However, a number of Alternatives as proposed in the Phase II Draft Environmental Impact Statement advanced, in our opinion, rather avaricious budget figures as requisite for full and complete implementation. The BH Forest Resource Association and BH Regional Multiple Use Coalition, in their Healthy Forest Alternative, enumerated some specific faults in this portion of the Forest Service's analysis. More important than the nature of the analysis, such projections implicitly and unnecessarily disqualify various proposed levels of timber harvest, small-tree thinning, fuel treatment, and prescribed fire from realistically coming to fruition.

Neither, however, would it be my position that the Forest Service should constrain its Alternatives based on speculation about future Congressional appropriations. I recognize that budget projections in some form are a necessary evil of the Forest Planning process, and merely offer my recommendation that a more careful balance is sought between the proposed means of moving from existing to desired landscape conditions, and realistic

costs of implementation. Important considerations for revisiting or reanalyzing Alternatives' projected budgets, per the analysis of the Healthy Forest Alternative, include the following:

- a) Better disclosing the anticipated cost associated with individual elements of an Alternative's proposed treatments, such that the public can openly evaluate the proposal and its likelihood of implementation;
- b) Greater Forest-level retention of offsetting revenue from commercial harvest treatments, such as those distributed from the Knutsen-Vanderberg Fund, within the respective harvest levels each Alternative would facilitate;
- b) The potential advent of new market outlets for small-diameter trees and other woody biomass, recognizing the Forest Service's role in enabling the establishment of such outlets;
- c) The NEPA and other project preparation cost-savings reasonably foreseeable from management direction in the respective Alternatives;
- d) The project preparation cost savings reasonably foreseeable from administrative authorities newly bestowed upon the agency, such as Stewardship Contracts, Categorical Exclusions, and the Healthy Forest Restoration Act.

APPENDIX C (re forest age and structural distribution)
(document suggested by Aaron Everett; cited in DEIS)

Larry T. DeBlander. 2002. Forest Resources of the Black Hills National Forest. Rocky Mountain Research Station. Ogden, UT. August. 13p.