Krueger, Elizabeth -FS

From: Jacobson, Scott J -FS
Sent: Thursday, October 26, 2017 10:13 AM
To: Davy, Anne - FS; Krueger, Elizabeth -FS
Cc: FS-pdl r2 bh nfab; Van Every, Mark -FS; Krueger, Jerome A -FS; Morris, Twila G -FS; Honors, Kelly -FS; Dick Terry
Subject: NFAB Comments on BHRL DEIS
Attachments: NFAB_Comments_BHRL_DEIS.pdf; Supplement to NFAB Comments on BHRL DEIS.pdf

Please find attached the NFAB comments, as well as a supplement document, pertaining to the Black Hills Resilient Landscape (BHRL) project Draft Environmental Impact Statement (DEIS).

Let me know if questions. Thanks

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Mr. Mark Van Every
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RE: Black Hills National Forest Advisory Board Comments to the Black Hills Resilient Landscapes Project DEIS dated October 2017

Dear Forest Supervisor Van Every:

The Black Hills National Forest Advisory Board (BHNFAB) submits the following comments in response to the *Black Hills Resilient Landscapes Project DEIS* Request for Comments. The BHNFAB is a Federal Advisory Committee Act chartered Black Hills advisory collaborative group with 16 primary board members representing a variety of interest areas.

The Black Hills National Forest Advisory board thanks the Forest Service for producing an EIS that is comprehensive and actionable. The BHRL project as proposed should enhance the resilience and health of the forest. The recent mountain pine beetle infestation has left behind a changed landscape and if well implemented this project could provide a renewed focus on ecological resilience.

The following is a list of comments and recommendations for your consideration:

Resilience

1 • Preserving and increasing resilience must be the highest priority of this project. Black Hills ecological systems must have the ability to absorb disturbance while retaining the same basic structure and ways of functioning, the capacity for self-organization, and the capacity to adapt to stress and change.

Prescribed Burning

2 • The DEIS calls for up to 10,000 acres of prescribed fire treatments per year or up to 100,000 acres for the length of the project. This is a commendable goal **since it is the primary tool for promoting a healthy understory and for invigorating hardwood species.** The potential prescribed burn areas (page 21) of 225,000 seems too limiting to achieve this objective. Prescribed burning is one viable option to reduce understory vegetation in Structural Stage 5 stands, however, many of the existing SS5 stands are outside of the

area designated for burning. We recommend that the potential area be widened. We also recommend that when setting objectives for prescribed burns that a mortality limit of <5% of overstory be included in the prescription.

- Where prescribed burning has been done in the past 20-30 years, repeat prescribed fire in order to mimic native fire regimes. A fire dependent forest ecosystem that is resilient is substantially in touch with natural fire regimes. We commend the USFS for placing
3 high priority on prescribed fire as a management activity in this project. It is important that prescribed fire, especially broadcast burning, is carried on as a viable means of reducing regeneration of young pines and promoting resilience.

- Where appropriate, burn in logged areas within eight years of harvest. Seek
4, 5 collaboration with communities and individuals on projects that aim to reduce surface fuels.

Aspen, Birch, and Oak

- The DEIS has lowered the number of acres for protection and promotion of aspen and
6 therefore lowered its aspen regeneration estimates. Current acreages of aspen (40,500) are less than half of the minimum called for by the Forest Plan objective 201 (92,000).

- Regarding the removal of encroaching pine/spruce from aspen/birch stands, we recommended raising the number of acres from 6,000 to 15,000 acres. To our dismay, the DEIS has further lowered this acreage to 2,400. We find this level inadequate and falling short of the objective of perpetuating aspen and oak to diversify habitat and
7 scenery. The same commitment should be shown to protecting oak, grasslands, and uneven aged pine stands as per objectives. We advise the Forest Service to take advantage of opportunities where they exist.

Disturbance and Weeds

- Ecosystem resilience can be achieved by keeping native plant and animal communities intact. Non-native invasive plants could flourish and threaten the integrity of Black Hills plant communities. When disturbance is necessary, continue to work with USFS foresters, silviculturists, botanists and wildlife biologists, and follow their advice. When
8 necessary to achieve resource objectives, schedule logging activities and associated road construction activities during dry or frozen conditions to minimize ground disturbance. This prevents noxious weeds from germinating, results in less regeneration of pine seedlings, and preserves native forb communities.
9 - We suggest the FS explore the use of goats for weed management and for eliminating underbrush.

Climate Change

- As it relates to the idea of resilience, climate change will "push certain ecosystems and species beyond their capacity to recover" (West and others 2009). Additionally, aspen stands are expected to decline by 40% within 50 years as reduced soil moisture and
10 changing fire patterns affect the trees. Within BHRL it is imperative that climate change is taken into account in action so as not to place resources on fragile stands or species whose viability may not be assured moving forward.

- Impacts from insects, wildfire, drought, and heat are being exacerbated by climate change. The trend indicates potentially hotter and drier conditions that amplify existing stressors and also create their own. Even a degree or two of temperature rise is known to have an exponential effect on fire behavior. Resiliency to stressors must be viewed in the light of climate change.

Structural Stage 5

- Special attention needs to be given to a management strategy for Structural Stage 5. As research and history have shown, stands of older, larger pines are difficult to maintain when fire is removed and historically dense conditions are widespread across the forest.
11 The Forest should develop a long term, science-based plan for these stands. Actively support stands being managed for SS 5 by removing the understory in these stands with cutting and/or burning.

Timber Harvest

- We recommend flexibility be built into the potential Commercial Treatment Areas when
12 onsite analysis occurs and there are updates to stand conditions, so that this plan will allow treatments to still be carried out.

- The land management activities in the DEIS include goals for maximum treated acres for harvest, burns, and hardwood enhancement. We recommend that these goals also
13 include achievable minimums per year for each management activity so that the project moves forward in a balanced way, so it truly results in a more resilient landscape.
- The effects of precommercial thinning/POL thinning are not adequately addressed in the DEIS as to how it relates to meeting the goals and objectives of specific Management Areas of the Forest Plan. Identifying a broad range of tree sizes (1 foot in height to 8.9" DBH) and a narrow range of spacing (12x12 to 24x24) fails to provide adequate information as to the effects and consequences of this action. For example, thinning 8" DBH trees to 24' x 24' spacing will produce a much different stand than thinning 1 foot
14 tall trees to 24' x 24' spacing. That wide of spacing of 1 foot tall trees will not be adequate to stock stands with trees, will eliminate self-pruning & increase fire hazard, it will create too open of a stand which will promote noxious weeds, it will not provide screening for wildlife, it will allow another crop of regeneration to become established, and it will not promote good tree form for timber production. We recommend categorizing the expected spacing to be used for each size class and include what the desired condition will be.

Monitoring

- Whenever feasible, identify benchmarks of success as management activities are implemented. Post treatment monitoring should be employed in a method consistent with the Forest Plan. In ten years, BHRL will be deemed a success if the described
15 treatments for Rx burn, thinning, aspen/birch, are accomplished. There will undoubtedly be tests of ecosystem resilience in the coming years and we should use those to gauge success and alter management approach as time goes forward.

Thank you for your consideration of these suggestions. We continue to be in full support and look forward to the implementation of this project.

Respectfully Submitted,

Robert Burns, NFAB Chairman

cc: Anne Davy, Project management, and Elizabeth Krueger, Team Leader