

## **Individual NFAB Comments on BHRL DEIS**

**(Supplement to Board approved comments)**

**October 25, 2017**

**Dave Hague:** Our discussion at our October meeting devolved quickly into a debate over “Climate Change” vs “Man Made Climate Change” and the question I put before the board, “Why do we need the two bullet points on Climate Change when the capacity for self-organization, and the capacity to adapt to stress and change is already stated in the section of Resilience?” was never specifically answered and throughout the course of the discussion it was pointed out by Paul and others that it is already in the DEIS and was also mandated policy from the last administration that the Forest is obligated to follow. Furthermore, it was pointed out by Danielle Wiebers that we had already litigated this issue with the first draft of the letter a few months before. Taking this discussion all into account I cannot see why it was included in the list of recommendations other than to make an agenda driven statement as a thinly veiled recommendation.

Beyond a shadow of a doubt, “Climate Change” exist, it has been changing since we established an atmosphere about 2 billion years ago; what is in doubt is “Man Made Climate Change”, this is at best an incomplete theory, at its worst it has been un-provable to date and several scientist over the past two decades have been accused of intentionally manipulating the data, contrary to popular opinion portrayed in the media, the climatologist aren’t in complete agreement, John Bates, a climate scientist who recently retired from the National Oceanic and Atmospheric Administration, accused his former colleagues of "flagrant manipulation of scientific integrity guidelines." he claimed that the lead author of an important 2015 climate study had rushed publication and mismanaged data, all in an effort to exaggerate recent warming trends and influence the fall 2015 Paris climate talks; and computer model predictions have been notoriously inaccurate...our climate is just as likely to trend the other way in terms of global cooling with an increase in moisture levels, one major volcanic eruption with a high content of silica dioxide could easily push our climate in that direction; in the early 70’s our climate was in a cooling period, several scientist and climatologist of the time believed we were headed into another “ice age” and were warning us to prepare for food shortages and forced migration to equatorial climates. Realistically, our meteorologist cannot predict what our weather will be like one year from now with any degree of accuracy, they definitely cannot be expected to be able to predict what it will be like ten years or 100 years from now. With all the unknown variables we are faced with, I feel it is extremely arrogant of us to think, as members of the human race, we can attempt to micro manage the course of nature in any meaningful way; I cannot in good conscience help to guide public policy and expenditure of our tax payor dollars in this manner, it is irresponsible of us to recommend they prepare for the unknown in this manor, it would be equally irresponsible of us to recommend they start preparing for the next eruption in Yellowstone or a large asteroid strike somewhere on the planet.

**Kelly Hepler:** On behalf of the SD Department of Game, Fish and Parks (SDGFP), Tony and I greatly appreciate all efforts by the subcommittee and NFAB to develop a letter of recommendations on the forest-wide project Black Hills Resilient Landscapes (BHRL). I would have preferred to voice our agency suggestions at the recent NFAB meeting but was unable to attend. Please accept these comments in lieu of my absence. SDGFP will be submitting separate comments on the BHRL DEIS. To ensure consistency with NFAB revised comments and our agency comments, I need to proceed carefully. In that context, I vote NO at this time. I realize that the NFAB consensus will result from the multiple-uses and interests represented on the Board, not just the interests my position represents.

At the NFAB meeting, Supervisor Mark Van Every asked the Board to not get lost in recommendation details, but stick to recommending how BHNF could wisely use its limited resources to focus management efforts towards the resiliency theme of BHRL. Because of Mark's request, I present concise reasons for a NO vote:

1. NFAB letter, paragraph 2 states that the [D]EIS is comprehensive and actionable. We disagree. The DEIS is not concise nor efficacious because it lacks the significant and required design criteria, mitigation measures, and implementation guides that are directly tiered to effects analysis for site- and species-specific habitat management practices. It is extremely difficult, for example, for my agency specialists reviewing the DEIS, to provide meaningful and useful wildlife and fisheries habitat data and suggested design criteria for the FEIS when no draft design criteria were included in the DEIS. The lack of design criteria, mitigation measures, and implementation guides (similar to what was included in Mountain Pine Beetle Response Project FEIS and after the ROD) is not conducive to effective habitat conservation practices that both our agencies strive to implement. SDGFP is very much committed to working with the BHNF resource specialists throughout this NEPA process and eventual timber treatments. Therefore, we recommend that these lacking directives be included within the DEIS and that the public be given a reasonable opportunity to respond and comment.

2. *Mechanical Site Preparation* paragraph was removed and we recommend it be restored. Until we consult with plant specialists that know how non-native, rhizomatous grasses respond to both prescribed fire *and* mechanical ripping, we cannot support this method of pine establishment. We do not support its use in native plant communities. The DEIS effects analysis lacked information of how this method is successful in non-native sod and did not offer options to hand seed/plant instead.

3. During the forest-wide Decision Notice (2003) for Noxious Weed Management Plan, BHNF and SDGFP specialists discussed the use of domestic livestock (sheep and goats) for weed control. Because of the known disease transmission issues between these domestic stock and bighorn sheep, the option to use trained sheep or goats to reduce noxious weeds was tabled. The USFS Region 2 wildlife biologist concurred. In the nearly 15 years since Weed Plan, there may be additional information and science to renew this discussion or conclude that it is still not a management option in order to retain viable bighorn sheep populations in the greater Black Hills. These discussions would not be able to be conducted within the BHRL timeframe but we are willing to discuss at a more convenient time.

**Alice Allen:** The BHRL is a very large project with the potential to affect thousands of acres of the Black Hills NF in many ways. As a member of the Black Hills National Forest Advisory Board, it is my charge to represent the concerns of dispersed recreationists including hikers, campers, equestrians, hunters, and many others Forest users. My concern regards maintaining and/or improving access to areas of the Forest designated for dispersed camping under the Record of Decision for the Black Hills National Forest Travel Management Plan (TM ROD).

The TM ROD designates 846,000 acres of the Forest to be open to vehicular access for the purpose of dispersed camping. These acres are located within 300 feet of certain designated Forest roads as displayed on the Travel Management Plan Map. The EIS for the Travel management Plan acknowledges that topography and vegetation may limit access to some of these acres. It is my personal experience that road design, primarily road ditches preclude vehicular access to many MORE acres. Additionally, the placement of road barriers on temporary roads or roads designated as permanently or seasonally closed, also limits access to these dispersed camping areas. The combined effect of all of these factors severely restricts the actual availability of these lands for dispersed camping.

The BHRL proposes to construct up to 18 miles of new permanent National Forest System (NFS) roads which would then be closed to public motorized use following construction and then closed to all motorized use upon project completion. In addition, up to 20 miles of existing, unauthorized roads would be reconstructed and then similarly closed at the end of the project. These road closures have the potential

to either enhance or reduce areas open to dispersed camping depending on how and where they are closed.

I request that the Forest Service consider dispersed camping when placing road closure barriers. Road closures should be implemented with barriers placed 300' back from the open road in areas designated for dispersed camping. This will allow more of the actual acres to truly be usable for dispersed camping.

I also request that road ditches be constructed the minimum in depth and with adequate width to allow a vehicle with a camping unit to cross in these same areas where possible.

The effect of these changes will be to spread dispersed camping use over more acres rather than concentrating such use in fewer areas. I believe this will contribute to a more sustainable resilient landscape in line with the goals of the Black hills Resilient Landscapes Project, as well as, the Black Hills Travel Management Plan. (Please incorporate the TM ROD by reference in the BHRL project EIS).