Date submitted (Mountain Standard Time): 10/31/2017 12:43:04 AM
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Comments:
Comment letter # 1 Black Hills Resilient Landscape DEIS.

I will attach a Prairie Hills Audubon Society (PHAS) original letter and an attachment.
With this letter we will be agreeing with the Black Hills Group of the Sierra Club's comment letter, which we will attach, so there will be two attachments to this note

Nancy Hilding
President
Prairie Hills Audubon Society
P.O Box 788
Black Hawk, SD 57718
October 30th, 2017

Black Hills Forest Service
Custer, SD 57718

Comment letter # 1 Black Hills Resilient Landscapes (BHRL)

Dear Forest Service Staff,

We have downloaded the attached letter of the Black Hills Group of the Sierra Club from your web site and we agree with the Black Hills Group of the Sierra Club concerns and wish to incorporate most of their letter by reference, with the exception of their last paragraph agreeing with the Norbeck Society's letter. We will write & submit our own letter, in which we will agree with most of the Norbeck Society's letter. Such a letter agreeing with the Norbeck Society will follow later.

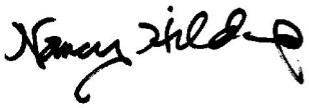
We concur with the Sierra Club, that the scope of the BHRL exceeds the purpose of the Healthy Forests Restoration Act (HFRA). We concur that the project is too large for HFRA to apply to it and BHRL attempts to short cut the forest planning law and rules and violates the Multiple Use Sustained Yield Act.

We concur that the Black Hills National Forest is currently engaged in not sustainable logging and will continue to do so under the BHRL. This violates requirements of 16 USC §1611.

We share concerns for adaptive management and future monitoring expressed by the Sierra Club.

Please keep us advised as to further actions concerning and related to the BHRL Project. Thank you for this opportunity to comment.

Thanks,



Nancy Hilding
President
Prairie Hills Audubon Society

1 Attachment - Sierra Club letter, Oct 30th, 2017

BLACK HILLS GROUP – SIERRA CLUB
P.O. Box 1624
Rapid City, South Dakota 57709

October 30, 2017

Mark Van Every, Forest Supervisor
Black Hills National Forest
1019 North 5th Street
Custer, South Dakota 57730

http://tinyurl.com/BHRLProject

RE: Comments on DEIS for the Black Hills Resilient Landscapes Project

Dear Forest Supervisor Van Every:

The Black Hills Group – Sierra Club (BHG) obtained the notice information and draft environmental impact statement for the above-referenced project from the Black Hills National Forest's website. The BHG has reviewed the draft environmental statement (DEIS) for the Black Hills Resilient Landscapes Project (BHRL), together with the detail maps linked on the website. The BHG and its members are familiar with and utilize the Black Hills National Forest on a regular basis. Individually and collectively, as the BHG, our members have been involved in and participated in forest planning and management on the Black Hills National Forest for more than 40 years.

Based on our review of the DEIS for the BHRL Project, the BHG wishes to make the following comments:

- THE SCOPE OF THE BHRL PROJECT EXCEEDS THE PURPOSE AND INTENT OF THE HEALTHY FORESTS RESTORATION ACT OF 2003, AS AMENDED.

The BHG believes that the BHRL Project is beyond the scope of the Healthy Forests Restoration Act of 2003, as amended. That legislation was designed and intended to enable a national forest to implement specific classes of vegetative treatment through a series of discrete projects under a national forest's existing forest plan (LRMP). The BHRL Project seeks to utilize this legislation as authority for the Black Hills National Forest (BHNF) to utilize vegetative treatments, in one single project, on substantially all public lands presently included in the BHNF's suitable timber base.

The BHRL essentially prescribing a new timber management program for the Black Hills National Forest. Presently the BHNF's timber program operates under the Phase I and Phase II amendments to its present LRMP, dating back to 1997. The National Forest Management Act of 1976 (NFMA), in the near future, will require the revision of the BHNF's forest plan (LFMP). That revision process will be utilizing the Forest Planning Rule adopted in 2012 (36 CFR 219, *et seq.*). That planning process would be programmatic, encompassing all of the resources of the BHNF, and their relationships to one another. The goal of programmatic forest planning under the NFMA is to put together a management plan for the national forest that that "provides a framework for integrated resource management and for guiding project and activity decision-making." 36 CFR 219.2(b

It appears to the BHG that, the BHRL Project attempts to shortcut planning process, eliminating the programmatic evaluation required to amend the BHNF's existing LRMP. This is problematic because the BHRL Project's DEIS does not adequately consider the cumulative impacts its implementation would have upon the other resources of the BHNF. Integrated resource management is abandoned and the timber program on the BHNF is given preference at the landscape level. We contend that that also constitutes a violation of the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. §§ 528-531) and the NFMA (16 USC §1607). Additionally, the BHRL Project would be implemented and operate under the LRMP standards, guidelines, and desired future condition specifications developed under the old 1982 forest planning rule. We do not find them to be necessarily compatible with what might be developed under the new 2012 forest planning rule.

- IMPLEMENTATION OF THE BHRL PROJECT WILL RESULT IN THE HARVEST OF AND UNSATAINABLE AMOUNT OF TIMBER IN VIOLATION OF THE NATIONAL FOREST MANAGEMENT ACT OF 1976

The present Black Hills Forest LRMP has been in effect for almost 20 years. During the last decade the BHG has become increasingly concerned about whether the allowable annual timber harvest on the Black Hills National Forest has exceeded the required sustainable yields required under 16 USC §1611. We were informed that the Phase II decision resulted in a recalculation of the sustained yield for the BHNF, substantially increasing the Allowable Sale Quantity (ASQ) over the limit set in the 1997 LRMP. By 2016 the BHNF had increased the ASQ on the forest to i181million cubic feet annually. We have been informed that in a few of the preceding years the ASQ has exceeded 200 million cubic feet annually.

This harvest is not sustainable; it has been exceeding the standards developed for the present Black Hills National Forest LRMP for too long. The BHG does not see the BHRL Project's DEIS addressing this situation and the matter of the sustainability of the timber resource on the BHNF. The DEIS does not take up the matter of sustained timber yield, nor does it address the ASQ on the forest while the BHRL would be implemented over the years to come. Instead the focus is on the acres treated by the Project; that is the only readily measureable metric for the Project.

Nor can the BHRL Project be justified as a form of adaptive management. Probably because the BHRL Project covers area at a landscape level, the DEIS fails to include objectives which are sufficiently detailed to enable subsequent evaluation to determine how well various Project activities are achieving the expected objectives across the Project area. Such an evaluation is the basis for refining future phases of the Project.
The monitoring identified in the BHRL Project DEIS inadequate. Pre-determined targets and objectives would have to be developed for the BHRL Project and in each of the areas in which the Project will be implemented. That is necessary to enable monitoring protocols to be established that will provided data which could make it possible to make necessary changes in the design and sequencing of the Project activities. Those type of monitoring protocols are required to be in place throughout the life of the Project.

- THE BLACK HILLS GROUP – SIERRA CLUB ADOPTS AND JOINS IN THE COMMENTS ON THE BHRL PROJECT DEIS SUBMITTED BY THE NORBECK SOCIETY ON OCTOBER 23, 2017.

The Black Hills Group – Sierra Club has reviewed the comments on the BHRL Project's DEIS submitted by the Norbeck Society on October 23, 2017. Except as said comments by the Norbeck Society may be in conflict with the foregoing comments of the Black Hills Group – Sierra Club on the BHRL Project's DEIS, the Black Hills Group – Sierra Club adopts and joins in the comments submitted by the Norbeck Society on October 23, 2017.

Please keep us advised as to further actions concerning and related to the BHRL Project. Thank you for this opportunity to comment.

Respectfully submitted,

BLACK HILLS GROUP – SIERRA CLUB

By: */s/ Jim Margadant*

Jim Margadant, for the BHG Conservation Committee

JFM/lm