

Elk Bugs and Fuels Project Final Environmental Impact Statement

Please continue your Elk Bugs and Fuel Project. After watching on television the massive forest fires that took place out west the last couple of years, I feel that we must start to create some roads that make areas of Wilderness available to fire fighters so that they can stay safe. Thanks for your service.

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04-01
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Brian Baxter

7/15/03 email

Comment	Response
04-01	No response is needed.



Dakota Territory Cruisers

909 Farlow Avenue

Rapid City, South Dakota 57701

Contact: Greg Mumm, 605-391-4547, e-mail: gregmumm@rushmore.com

Incooperation with:



Carl Leland, US Forest Service
U.S. Post Office, Room 201
18 South Mill Avenue
Ridgway, PA 15853

July 12, 2003

RE: Elk, Bugs and Fuels project.

Dear Sirs:

As you may recall from during the scoping period of this project, the Black Hills 4-Wheelers and the Dakota Territory Cruisers are commenting as a single source herein.

In general terms of the Elk, Bugs and Fuels project planning, we are, with the following qualifiers, in favor of the preferred alternative #4 which is the Wildland Urban Interface Emphasis. It is extremely important the project take the steps it is originally intended to take in dealing with the fuels loading in that area and to deal with the related bug issues. We all know how bad it has become. We do feel however, it is equally important to take the right steps in managing travel and recreational opportunities. Both are of major concern to us.

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With regard to the above-mentioned project, we would like to thank you for considering our comments during the scoping period. We were thankful to see in the Draft Environmental Impact Statement that most of the trails we currently hold special use permits on were specifically excluded from all the alternatives with the exception of the access roads into the trails we call Buzzworms. Those roads we use for access are indicated on the inventory maps as 168.2a and 168.2b on the south side of 168.s (Runkle Road) and are still proposed for decommissioning in the DEIS. We are respectfully asking you to eliminate these two roads from the proposed decommissioning list.

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Also, it must be pointed out that all the alternatives presented will close nearly 60 miles of roads. While we don't regularly use these roads and many of those proposed for closure are spur roads, some of them should be left open for other reasons such as fire

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Elk Bugs and Fuels Project Final Environmental Impact Statement

management, hunting and fishing access and even should be considered for recreational opportunities. In fact, it is our contention, a page should be taken from the Prairie Project planning process in the Mystic Ranger District in which rather than simply close and decommission roads and trails, they have planned with recreational development opportunities in mind. We encourage you to alternatively take a second look at some of the roads slated for closure and/or decommissioning. We recognize the ever increasing interest for off-highway motorized and non-motorized recreation on public lands and believe this is a viable multiple-use of the forest that should be more completely addressed in this as well as all planning processes.

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With that in mind, we also would like to refer back to a remaining couple of comments from letter during the scoping period that should still be addressed.

- 1) The road you have marked as U080151 that is between 168.2 and 169.1 along with the road you have marked as U080153 is used by both of our clubs as an easy trail to the remarkable lookout over Piedmont Valley. We also feel these two should be left open for fire management and search and rescue purposes. Closure of these would inhibit access in an unfruitful way.
- 2) The road marked as U080127 is a road we use as part of our permitted trail we call “Road to Galena”, as is U080104 and, the connector between 541.1b and 541.1g
- 3) We also often use and enjoy the roads you have marked as U080105, U080106 (between U080105 and 135.2g), and U080110 (between U080105 and 541.1). We are opposed to closure of these roads not only because of our use but they also serve as alternate egress for other management purposes that would include search and rescue and fire.
- 4) We also believe you should not close U090018 that connects 168.3 to 704.1.
- 5) Finally, we would like to see you leave the connection between 170.5b to 170.5d that you have marked U080044E. Although this is not a road we often use, both on the map and in the field it provides alternate ingress and/or egress in that specific area and we believe that makes it important for management in emergency situations.

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We would also like to extend the same offer of our previous letter:

There are several user developed roads and trails in the Bear Butte Creek area that are unsightly, unuseful and causing damage. We would like to offer our help to obliterate those roads/trails as a joint labor and financial project between the FS and our clubs. We think once completed, a little signage would help to eliminate that happening in the future. (Something along the lines of: “The Black Hills 4-Wheelers, the Dakota Territory Cruisers, and the USFS request you avoid resource damage and stay on the marked trail” would go a long way toward good ends in that regard.)

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We also would like to offer our cooperation and help in other areas to this same end.

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Thanks for the opportunity to comment and to be part of the planning process. We hold those rights and opportunities very dear.

Sincerely,

Greg Mumm

Land Use Chair on behalf of the Dakota Territory Cruisers and the BH 4-Wheelers

Comment	Response
05-01	No response is needed.
05-02	Corrections to the FEIS have eliminated the proposed closure of FSRs 168.2A and 168.2B.
05-03, 05-04, 05-05	<p>The Black Hills National Forest is beginning to address the large and complex issue of motorized recreation. Development and management of motorized recreation are long overdue in some areas of the Forest. Some of the roads mentioned by the commentator could no doubt form part of a developed trail system. Because the Elk Bugs and Fuels project was developed to respond as quickly as possible to the existing forest health problem and hazardous fuels, it does not fully address the issue of motorized recreation or include proposals related to development of motorized recreation facilities. As noted by the commentator, Mystic Ranger District took on the issue in a recent project. Though the Revised Forest Plan contains little specific direction on motorized recreation, it is likely that the Forest will continue to increase efforts to manage and develop this activity. The Forest Service welcomes opportunities for cooperative efforts with local clubs.</p> <p>Because big game habitat effectiveness guidelines in Revised Forest Plan management area direction are related to open road density, the Elk Bugs and Fuels project does address this issue. Much of the project area is in management area 5.4 (big game winter range emphasis). Minimum allowable habitat effectiveness is higher in this management area than most others. Because open road density so strongly affects habitat effectiveness values, activities in 5.4 must minimize open road density and subsequent disturbance of wildlife. In addition, the project area includes management areas 3.32 (backcountry non-motorized emphasis) and 4.1 (limited motorized use and forest products emphasis). Direction for both of these areas calls for limited or no motorized use, which requires road closure or decommissioning.</p>

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PO Box 3271
Laramie, Wyoming
82071
July 4, 2003

Elk Bugs and Fuel Project
Northern Hills Ranger District
Black Hills National Forest
2014 North Main Street
Spearfish, SD 57783

Dear Black Hills National Forest,

I am writing to comment upon the draft EIS for the Elk Bugs and Fuels project. I am writing as a citizen concerned with the management of the Black Hills, but I happen to also be a Professor at the University of Wyoming and author of some 75 peer-reviewed scientific articles and books, many of which address fire ecology in the Rocky Mountains. An example is a comprehensive review of the role of climate in fire in the Rocky Mountains (Baker 2003).

I am disappointed in the biased use of science in the EIS. Chapter 3 - Environmental Effects (Transportation System, Fire Hazard and Fuel Loading) of the draft EIS reviews our published research and that of others on the natural fire regime of the Black Hills, citing Shinneman and Baker (1997) and Baker and Ehle (2001) of which I am an author.

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The EIS significantly mis-interprets our scientific findings and the state of the science regarding Black Hills fire regimes. First, the finding of Shinneman and Baker that the Black Hills has regular crown fires is suggested to be qualitative and speculative. To the contrary, the occurrence of crown fires is well documented in historical documents reviewed by Shinneman and Baker. However, it is entirely speculative for this EIS to suggest that crown fires were rare or uncommon, as there is no present scientific basis for this conclusion.

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It is true that the occurrence of surface fires in the Black Hills is also well documented, particularly by the research of Peter Brown and Carolyn Sieg. However, there is no scientific basis for the assertion in the EIS that these surface fires were frequent or that they would have prevented crown fires. The assertion that surface fires were frequent is refuted by the peer-reviewed study by Baker and Ehle (2001), which shows that the fire-history methods used by Brown and Sieg are biased and would lead to an incorrect conclusion that surface fires are frequent. It is likely that surface fires occurred at much longer intervals than reported by Brown and Sieg. The assertion that surface fires prevent crown fires is based on outdated scientific research that failed to recognize the

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significant role of drought and extreme fire weather in the occurrence of crown fires. A recent review of the evidence for this is in Baker (2003).

However, the simple occurrence of surface fires does not mean that the Black Hills National Forest belongs in Condition Class 3, as there is no sound scientific basis, given the evidence presented in Baker and Ehle (2001) that the forest has actually missed significant numbers of surface fires. Moreover, crown fires are a natural part of the fire regime, and there is no scientific basis whatsoever for the assertion that they have become more frequent than they were in the past in the Black Hills. There are no data whatsoever with which this assertion can be tested.

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The Forest also fails to miss an important distinction of Black Hills ponderosa pine. The natural density of these forests has been well documented to have been high relative to other ponderosa pine forests, such as those of the Southwest. The data in McAdams thesis, for example, show that the pre-EuroAmerican density of these forests was as much as 5 times as high as those of the Southwest. Shinneman and Baker (1997) also review evidence that these forests contained a high density of large, old trees before industrial logging began.

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The Forest also fails to acknowledge increasing scientific and other evidence that crown fires in ponderosa pine forests in this region are strongly associated with severe drought and extreme fire weather, and under those conditions crown fires will likely be little affected by fuel conditions or stand structure (i.e., tree density). Local evidence of this includes the Jasper fire, which burned through highly managed and thinned forests but more compelling scientific analysis comes from the recent scientific assessment of the Hayman fire in Colorado by the Rocky Mountain Research Station. I doubt that a compelling case can be made, based on science, that thinning will have a significant effect on the occurrence of crown fires in the Black Hills. The present EIS fails to present a compelling science-based case.

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I hope the Black Hills National Forest will stop attempting to overturn peer-reviewed science (Shinneman and Baker 1997, Baker and Ehle 2001) with a few off-the-cuff dismissals based on manager opinion, and instead develop a sound science-based proposal for managing the Black Hills. It is unlikely that this would include extensive thinning of forests in an attempt to prevent crown fires, as these forests were dense in many places and prone to drought and extreme fire weather that naturally lead to crown fires.

Sincerely,



William L. Baker

Citation:

Baker, W. L. 2003. Fires and climate in forested landscapes of the U.S. Rocky Mountains. Pages 120-157 In: Fire and Climatic Change in Temperate Ecosystems of the Western Americas, edited by Thomas T. Veblen, William L. Baker, Gloria Montenegro, and Thomas W. Swetnam. Springer-Verlag, New York.

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Comment	Response
06-01	Statements in the DEIS acknowledge that crown fires occurred historically in the Black Hills. The project fuels specialist used peer-reviewed literature on ponderosa pine in the Black Hills and forests across the western United States to determine the dominant fire type.
06-02	See response to Comment 06-01.
06-03	The EIS refers to several studies conducted in the Black Hills and elsewhere in the western United States that document historic fire occurrence and intensity. The EIS acknowledges that some of the literature offers conflicting views on ponderosa pine ecology. Proposed treatments were developed to meet the purpose of and need for action stated in Chapter 1. Discussion of the relationships among weather conditions, fuels, and the occurrence of intense wildfire has been added to the FEIS.
06-04	Proposed actions were developed to meet the purpose of and need for action stated in Chapter 1. Stand density is addressed primarily as an indicator of fuel hazard; additional discussion of density has been added to the EIS.
06-05	The EIS uses the most current modeling techniques and Revised Forest Plan direction to determine fuel hazard ratings and predicted fire behavior. Weather parameters used for modeling are from the applicable weather station and meet Revised Forest Plan guidelines. Information has been added to the FEIS regarding the role of weather in fire behavior.

Elk Bugs and Fuels Project Final Environmental Impact Statement

Dear Mr. Leland,

I urge you to adopt Alternative 3 of the DEIS regarding this project. This alternative which emphasizes wildlife is most appropriate. Wildlife are vitally important to maintaining a balanced forest ecosystem as well as providing economically to the entire region. Wildlife viewing and hunting provide millions of dollars to the regional economy. They are a major component of the ecosystem that draws people to the area to live and recreate.

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Please adopt Alternative 3 of the DEIS.

Also, please place me on the mailing list to receive all future info/ mailings regarding this issue.

Sincerely,

Duane Claypool
911 S. Sutton Ave.
Miles City, Mt.
59301
claypool@midrivers.com

Comment	Response
07-01	Your support of Alternative 3 is acknowledged. Those who commented on the DEIS will be notified when a decision has been made on this project.

RECEIVED 7/11/03 CA

SUMMARY OF THE TIMBER COMMITTEE

Comments on the Elk Bugs & Fuels EIS

Introduction: The Timber Committee of the Lawrence County Environmental Review Ordinance consisting of Bill Coburn (Chairperson), Druse Kellogg, Dean Rasmuson, Jerry Jensen, and Brad Gordon respectfully submits the following findings and comments to the Lawrence County Commissioners.

Custom, Culture and Economic Stability: The harvest of timber and the production of wood products has been and currently is an important part of the custom and culture of Lawrence County. Historical documents give evidence that when this county was settled during the late 1800's many people were gainfully employed in the harvesting of trees for the many types of woods products that these early settlers needed. It is estimated that by 1897 over 1.5 billion board feet had been harvested from the Black Hills for use by these earlier settlers. The harvest of this timber also created wealth for the people by providing much needed jobs and economic activity. The 1940 census shows that 1022 people were directly employed by the forest products industry. Unfortunately the census does not indicate whether this included loggers. The 1990 census indicates that almost 500 people were employed in Lawrence County by this industry providing over \$14 million in wages and benefits. These wages are some of the highest paid by any industrial sector operating in the county. The economic impacts that Lawrence County receives from the Black Hills National Forest selling timber is significant. In fiscal year 1998 the county received over \$940,000 from the 25% fund. The county also recognizes that the main purposes for managing the national forests as mandated in the "Organic Act" was "to preserve and protect the forests", "to furnish a continuous supply of timber for the use and necessities of the citizens of the United States", and "to secure favorable conditions of water flows". The first timber to offered for sale under this Act in the United States was sold to Homestake Mining Company in Lawrence County in 1898.

General Comments: In light of the importance of the timber industry and the selling of National Forest timber to the custom, culture and economic stability of Lawrence County, the Timber Committee expresses the following comments and concerns in response to the Black Hills National Forest's for the Elk Bugs and Fuels Environmental Impact Statement. Our committee recognizes the tremendous challenge that the USFS is faced with in preparing a suitable document and plan. Our intent is to assist the Black Hills National Forest in preparing a project that will have the most positive benefits on the citizens of Lawrence County

I. Area Description and Size

The Elk Bugs and Fuels Project Area is located in Lawrence and Meade counties, in the northeastern Black Hills southwest of Sturgis.

It covers 44,766 acres of National Forest and 15,605 acres of interspersed private and state lands.

Purpose and Need for Project

After review of the three action alternatives we find that none of the alternatives proposed will substantially meet the intent or stated purpose and need for the project area.

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Vegetation Management

The major problem with all action alternatives is that they do not consider treatment of 4C, 4B and 3C stands. These are the stands most susceptible to mountain pine beetle and greatest loss when large fires occur. When a management practice, such as overstory removal, is eliminated from consideration it reduces management options, increases the potential for greater losses of wildlife habitat and constrains management decisions. When all 4C & 4B stands are eliminated from consideration for treatment because of potential goshawk habitat it defeats the purpose because there is a greater potential for long-term loss of the habitat that supports goshawks. Before the final document is prepared a “risk of loss” analysis should be calculated.

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Mountain Pine Beetle

Considering all treatments, there is only a slight reduction in timber stands conditions that are Highly and Moderately at risk for Mountain Pine Beetle attack. Stands at moderate risk are not changed from the current condition and stands at high risk are only reduced by 3%. The elimination of 4B & 4C stands from consideration for treatment has resulted in a continued high level of potential loss of timber values, wildlife habitat, watershed degradation and flooding. With continued growth those stands at moderate risk will be in the high risk category within 10 to 20 years.

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Decommissioning of Roads

Roads designated for decommissioning include historic roads that existed prior to designation of the National Forest and fall under Rule 2477. Some of these roads lead to private land and serve as access for management purposes and firebreaks. Others have been replaced by alternate routes and are no longer needed. As an example road segments U040039A & U040039B are no longer needed because they have been replaced by more recently constructed roads. However, road U080153 is a road on top of a ridge that leads to private land, is not eroding and should remain open. We prefer gates as the best method for decommissioning roads. Access to the Black Hills National Forest is an important part of our local custom and culture. It is recommended that the Forest Service conduct an analysis of all roads covered by RU2477 and consult with the Lawrence County Commissioners prior to closure.

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Watersheds

Data shows that the highest erosion rate in the project area is from watersheds within the Grizzly Gulch fire. The no treatment alternative has the highest risk for increase erosion, nutrient loss, soil heating and development of hydrophobic soils. Excluding the soil

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08-05

Elk Bugs and Fuels Project Final Environmental Impact Statement

Comment	Response
08-01	Treatments proposed under Alternatives 2, 3, and 4 respond to needs outlined in Chapter 1, Purpose and Need For Action. Effects are disclosed in Chapter 3.
08-02	<p>Ponderosa pine structural stage 3C, 4B, and 4C stands would be treated under Alternatives 2, 3, and 4. Table 70 displays existing and post-treatment stocking, indicating a reduction of stands in 4B (40-59% AMD), 4C, and 3C (60%+ AMD) structural stages. Appendix D displays existing and post-treatment habitat structural stages of stands proposed for treatment. Post-treatment mountain pine beetle risk is disclosed in Table 67. The EIS acknowledges that dense ponderosa pine stands are susceptible to mountain pine beetle-caused losses (Chapter 3, Biological Environment/Forest Vegetation/Direct and Indirect Effects/Forest Insects, Stand Structure and Stocking, Stand Diversity, and Cumulative Effects).</p> <p>The rationale for foregoing treatment of potential goshawk nesting habitat is disclosed in Chapter 2, Alternatives Considered but Eliminated from Detailed Study. Not all 4B and 4C stands were eliminated from treatment (Chapter 3, Biological Environment – Wildlife Habitat – Environmental Consequences – Northern Goshawk; Appendix D, Stand Attributes).</p>
08-03	Even after thinning, stands often remain in the “moderate risk” class using the rating system guide developed by the Rocky Mountain Forest and Range Experiment Station. The EIS acknowledges the continued risk and return of risk in the future (Chapter 3, Biological Environment – Forest Vegetation – Direct and Indirect Effects – Forest Insects).
08-04	<p>Public road agencies may make a claim to a road under RS2477 authority. The Forest Service is currently unaware of any RS2477 road claims on the Forest. It is not the responsibility of the Forest Service to determine which roads may or may not be claimed under RS2477.</p> <p>To establish a valid RS2477 right-of-way claim in a National Forest, proof must be shown that the road existed before the land was reserved or placed in a National Forest or Forest Reserve. Proof can be in the form of historic maps, diaries, county records, Forest Service or BLM documents, or other evidence.</p>
08-05	The National Environmental Policy Act requires that the no-action alternative be analyzed, interpreted, and discussed. Such documentation is found in all sections under both the Environmental Consequences and Cumulative Effects sections. By definition, no new treatments are proposed under the no-action alternative.

erosion from the Grizzly Gulch fire, management activities and treatments are not significant for any of the alternatives. The big potential impact for soil loss, flooding and loss of long term productivity comes from catastrophic fires. Since there is 28% probability for a 10,000 acre of larger fire in the project area within the next 10 years, management decisions should be more aggressive and implement treatments that reduce this risk of loss.

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Fuel Conditions

The project area contains 20,599 acres in fuel condition class 3. This represents 46% of the project area as high fuel hazard with only a 4% reduction after treatment in alternative 4. This leaves 18,138 acres untreated and classed as high fuel hazard. This is an unacceptable risk considering all the intermingled private lands, threat to communities and potential loss of resources. There are not sufficient local manpower or fire suppression resources available to manage this high level of risk for loss.

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Summary

Include in the Final EIS analysis for treatment all stands that are highly susceptible to Mountain Pine Beetle attack and high fire hazard. If any of these stands support current nesting sites for Goshawk, the stands can be excluded prior to implementation of treatment. Since many of these stands also can provide the best habitat for Goshawk there is greater chance of loss if these stands are not treated. Left untreated, the potential is high that some 4C & 4B stands will be lost for a long period of time that provide Goshawk habitat. When the “risk of loss” is calculated, there is a greater net loss of resources (natural, economic & social) if these stands are not treated. Decision makers need to take these risks into account to wisely manage resources for their maximum long-term benefit to society.

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Since the 4C, 4B and 3C stands were eliminated from consideration in this project proposal, the Forest Service should prepare to move forward as quickly as possible to consider these stands for treatment once the goshawk inventories are completed.

Of the alternatives presented, alternative 4 will move closer to accomplish the stated purpose and need for the project area.

Respectfully Submitted by

Bill Coburn
Chairman
Lawrence County Timber Committee

Elk Bugs and Fuels Project Final Environmental Impact Statement

Comment	Response
08-06	The EIS displays the direct and indirect effects of the alternatives as well as the cumulative effects due to P.L. 107-206. Most of the areas proposed for treatment are within a half-mile of private property.
08-07	The rationale for foregoing treatment of potential goshawk nesting habitat is discussed in Chapter 2, Alternatives Considered but Eliminated from Detailed Study. See also response to Comment 02-11.

Elk Bugs and Fuels Project Final Environmental Impact Statement

Dear Mr. Thom. Received your impact statement study the other day. Thank you for sending it to us. We live at the top of Strawberry Hill outside of Deadwood about three miles, in section 12, township 4N. This area around our home I hope is slated for some of the work that will be done. I really look forward to this area being thinned as the fire potential and potential for a large infestation of bark beetles is very much a reality here. Was wondering if the slash will be piled and burned, how soon the project will begin, and will it be affecting the forest service property near my home? Also, will there be an opportunity to utilize the thinned trees for firewood? Looking forward to this project beginning and am much in favor of it. Thanks, Doug Miller 21258 Hy. 385 Deadwood, SD 57732
 Regards,

Doug and Charlene

09-02 09-01


Comment	Response
09-01	In most cases, slash resulting from proposed commercial thinning would be removed and disposed of, or burned at log landings. If one of the action alternatives is selected, implementation would begin in 2004.
09-02	<p>The cited location is outside the project area, so no treatments are proposed. The Mineral Forest Management Project is, however, proposed in this area; this project is currently being analyzed and is scheduled to take place in 2005.</p> <p>The potential for use of thinned trees as firewood would be determined following completion of harvest in each unit. Location, access, and demand are among the factors used to determine the need for establishment of a designated firewood cutting area.</p>



Mr. Carl Leland
US Forest Service
U.S. Post Office, Room 201
18 South Mill Ave.
Ridgeway, PA 15853

Elk Bugs & Fuels EIS – Comments, 7-14-2003

Pope and Talbot Inc, respectfully submits the following findings and comments regarding the Elk Bugs & Fuels EIS.

General Comments: In light of the importance of the timber industry and the selling of National Forest timber to the custom, culture and economic stability of all the communities in the entire Black Hills region, Pope and Talbot Inc. expresses the following comments and concerns in response to the Black Hills National Forest’s release of the Elk Bugs and Fuels Environmental Impact Statement. We recognize the tremendous challenge that the USFS is faced with in preparing a suitable document and plan. Our intent is to assist the Black Hills National Forest in preparing a proactive plan that meets the original stated goals of The Elk Bugs and Fuels EIS.

Area Description and Size

The Elk Bugs and Fuels Project Area is located in Lawrence and Meade counties, in the northeastern Black Hills southwest of Sturgis. It covers 44,766 acres of National Forest and 15,605 acres of interspersed private and state lands.

Purpose and Need for Project

After reviewing the three action alternatives we find that none of the alternatives proposed will substantially meet the intent or stated purpose and need for the project area. None of the project’s Alternatives propose treatments remotely extensive enough to meet its stated Purpose and Need of “*reducing the susceptibility of vegetation to uncharacteristically intense wildfire and outbreaks of mountain pine beetle*”. The project has failed to present a reasonable range of Alternatives.

Vegetation Management

The major problem with each of the action alternatives is that none or them consider treatment of 4C, 4B and 3C stands. These are the stands most susceptible to mountain pine beetle and the greatest loss when large catastrophic fires occur. When a management practice, such as overstory removal, is eliminated from consideration it reduces management options, increases the potential for greater losses of wildlife habitat

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and constricts management decisions. When all 4C & 4B stands are eliminated from consideration for treatment because of potential goshawk habitat the original purpose of the Elk Bugs & Fuels EIS is defeated. It is inevitable that these stands will be lost to mountain pine beetle or wildfire within the next ten years if they are not treated immediately, and this represents a clearly negative impact on not only resource production, but overall public welfare, air quality, scenic integrity, and nearly all Threatened, Endangered, or Sensitive Species analyzed in the EIS. Before the final document is prepared a “risk of loss” analysis should be calculated.

10-02

Mountain Pine Beetle

Considering all treatments, there is only a slight reduction in timber stand conditions that are Highly and Moderately at risk for Mountain Pine Beetle attack. Stands at moderate risk are not changed from the current condition and stands at high risk are only reduced by 3%. The elimination of 4B & 4C stands from consideration for treatment has resulted in a continued high level of potential loss of timber values, wildlife habitat, watershed degradation and flooding. With continued growth those stands at moderate risk will be in the high risk category within 10 to 20 years.

10-03

Decommissioning of Roads

Roads designated for decommissioning include historic roads that existed prior to designation of the National Forest and fall under Rule 2477. Some of these roads lead to private land and serve as access for management purposes and firebreaks. Others have been replaced by alternate routes and are no longer needed. As an example road segments U040039A & U040039B are no longer needed because they have been replaced by more recently constructed roads. However, road U080153 is a road on top of a ridge that leads to private land, is not eroding and should remain open. It is recommended that the Forest Service conduct an analysis of all roads covered by RU2477 and consult with the Lawrence County Commissioners prior to closure.

10-04

Watersheds

Data shows that the highest erosion rate in the project area is from watersheds within the Grizzly Gulch fire. The no treatment alternative has the highest risk for increase erosion, nutrient loss, soil heating and development of hydrophobic soils. Excluding the soil erosion from the Grizzly Gulch fire, management activities and treatments are not significant for any of the alternatives. The big potential impact for soil loss, flooding and loss of long term productivity comes from catastrophic fires. Since there is 28% probability for a 10,000 acre of larger fire in the project area within the next 10 years, management decisions should be more aggressive and implement treatments that reduce this risk of loss.

10-05

Fuel Conditions

The project area contains 20,599 acres in fuel condition class 3. This represents 46% of the project area as high fuel hazard with only a 4% reduction after treatment in alternative 4. This leaves 18,138 acres untreated and classed as high fuel hazard. This is an *unacceptable risk* considering all the intermingled private lands, catastrophic threat to

10-06

Elk Bugs and Fuels Project Final Environmental Impact Statement

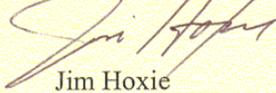
communities and potential loss of resources. There are not sufficient local manpower or fire suppression resources available to manage this high level of risk.

Summary

Include in the Final EIS analysis for treatment all stands that are highly susceptible to Mountain Pine Beetle attack and high fire hazard. If any of these stands support current nesting sites for Goshawk, the stands can be excluded prior to implementation of treatment. Since many of these stands also can provide the best habitat for Goshawk there is greater chance of loss if these stands are not treated. When the “risk of loss” is calculated, there is a greater net loss of resources (natural, economic & social) if these stands are not treated. Decision makers need to take these risks into account to wisely manage resources for their maximum long-term benefit to society.

The Proposed Alternatives do not adequately address the high risk potential of catastrophic fire nor does it mitigate the huge problem of epidemic mountain pine beetle infestation. We recommend a ***non-significant Amendment*** to address the superceding concerns of insects and wildfire before more habitat is lost and more resource damage is incurred.

Respectfully Submitted



Jim Hoxie
Black Hills Resource Manager

10-06
10-07
10-08

Comment	Response
10-01 through 10-08	Comments are nearly identical to those submitted by the Lawrence County Commission – see responses to Letter 8.

Elk Bugs and Fuels Project Final Environmental Impact Statement

Elk, Bugs, and Fuels project
 Carl Leland, US Forest Service
 US Post Office, Room 201
 18 South Mill Avenue
 Ridgeway, PA 15853

Dear Sirs,

I have looked over the proposal for Elk Bugs and Fuels project and as a whole I agree with the fuel reduction in this area. The need to take care of serious fire hazard in the project area. I fully understand the need. What I don't understand is the need to **decommission roads in this area**. I actually think that to abandon the roads as far as maintenance goes is better then closing them specifically. I am aware that there are many unnecessary roads and that some sort of management should happen, A possible trail system or recreation plan would go along way towards reaching that goal.

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I am pleased to see that you will be honoring the trails that have special use permits. I need to point out that the access road to two of the permitted trails were overlooked. They are 168.2a and 168.2b on the south side of Runkle Road please take into consideration these two roads specifically as they are needed for access to permitted trails.

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11-02
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I am in support of Alternative #4.

I support active forest management. I do not support blanket closures of trails or access. Please manage for the public, not from the public. I can respect forest practices that protect areas like Harney Peak and the Needles. But not with the same practices used on Beaver Park.

Thank you for the opportunity to comment,



Rhonda Mumm
 909 Farlow Ave
 Rapid City, SD 57701

Comment	Response
11-01	See response to Comment 05-02.
11-02	See response to Comment 05-02.

Elk Bugs and Fuels Project Final Environmental Impact Statement

Mr. Carl Leland, US Forest Service
US Post Office, Room 201
18 South Mill Ave.
Ridgeway, PA 15853

July 14, 2003

Dear Mr. Leland,

I am a forest landowner in the vicinity of the proposed Elk, Bugs and Fuels project. In regard to the DEIS, its analysis, and proposed alternatives, please consider the following comments:

The Forest Service has correctly identified that the analysis area is in dire need of forest management to address the issues of mountain pine beetle infestation and wildfire risk. However, none of the alternatives the Forest Service has proposed comes close to adequately addressing the problem. Currently, 79 percent of the project area is at moderate or extreme risk from catastrophic fires. Similarly, over 60 percent of the project area is at risk from mountain pine beetles (though the project analysis fails to document the actual level of infestation). The proposed action's laughable decrease of nine and three percent, respectively, in these risks to forest resources is simply unacceptable.

I respect and understand that the Forest Service was unable to complete its goshawk and sensitive plant surveys in a timely fashion, and therefore must "assume presence" where suitable habitat exists. However, the Forest Service has grossly failed to account for the inevitable damage that would be incurred upon these habitats in the event of a catastrophic wildfire or mountain pine beetle infestation. This is a classic situation of not 'seeing the forest for the trees'. The choice facing the Forest Service is this: manage these habitats, or lose them to bugs and fire without hope of recovery for many generations to come. Surely, the Forest Service can assess the balance of potential harms associated with conducting forest management in "assumed" goshawk areas alongside the inevitable harms of catastrophic fire in these areas, and come to the same conclusion. I am confident that your rules and regulations can be adapted to fit the plain common sense realities of this situation.

Thank you for your time and consideration.

Sincerely,



Richard Finn

12-01

Comment	Response
12-01	See response to Comments 01-28, 01-33, 02-02, 02-03, 2-11, 03-27, 06-04, 06-05, 10-02, 14-7, and 14-20.

Elk Bugs and Fuels Project Final Environmental Impact Statement

Mr. Leland:

Thank you very much for taking the time to respond to my inquiry. I appreciate the information you sent. Thank you, as well, for the contacts.

John C. Rozell

----- Message from "Carl Leland" <cleland@fs.fed.us> on Mon, 9 Jun 2003 17:46:03 -0500 -----

To: "John Rozell" <jrozell@tristateflooring.com>

cc: "John Natvig" <jnatvig@fs.fed.us>, "Elizabeth Krueger" <ekrueger@fs.fed.us>

Subject Re: Question

:

Dear Mr. Rozell,

Thank you for your note concerning the Elk Bugs and Fuel project. The approach we are prescribing in the action alternatives for the project utilizes three approaches to decrease the spread of mountain pine beetles. The primary tool we are proposing calls for reducing the basal area of stands to below 80 square feet of basal area per acre. The latest research we have indicates that this approach leaves the remaining trees in a more vigorous condition and allows them to "fight off" attacks by mountain pine beetles. In areas where there is sufficient timber volume we propose to remove the trees that are cut, which includes currently infected trees, from the site. The third approach we are prescribing is to attract the insects using pheromone bait to a designated area and then remove or treat the infected trees on site (remove the bark). I am giving you this background information to try to answer your question. I do not know if there is a way to treat infected trees. I believe that once they show signs of successful mountain pine beetle attack, it is too late. I have forwarded this message on to our Silviculturist, John Natvig, who works out

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of our Fort Meade office to make sure that the information I am giving you is correct. His number is 605-720-7710 if you would like to contact him. We would be more than willing to share the information we have on treatment of mountain pine beetles. To my knowledge, sharing the approach we are using to combat the spread of mountain pine beetle would be about the extent of any "buy in" with nearby private land owners. There could be some programs available through the county or state that I am unaware of. I'm sure that the folks on the Black Hills National Forest could assist you in locating the appropriate state or local agency. I hope this answers your question. Feel free to contact me or John Natvig if you would like more information. Carl Leland

(Embedded image moved to file: pic07324.pcx)

"John Rozell"

<jrozell@tristatefl To: <cleland@fs.fed.us>
ooring.com> cc:

Subject: Question

06/09/2003 11:01 AM

Greetings, Mr. Leland

If a plan for treating infected trees is implemented, will there be opportunity to 'buy in' to the program by nearby private property?

John C. Rozell
Hill City, SD