

Enviro Events - Mid December 2008

Enviro Events - 3 alerts - Rattlesnake timber sale - deadline 12/22/08

Nancy Hilding
President of Prairie Hills Audubon Society (PHAS)
to Audubon members and friends.

This e-mail contains 3 alerts from different NGOs on proposed **Rattlesnake Project**
(timber sale)
(which would surround Sand Creek Roadless Area)

ITEM # 1 - Prairie Hills Audubon Society's (PHAS's) alert text -
ITEM # 2. Norbeck Society's alert as text (without the graphics)
ITEM # 3. Biodiversity Conservation Alliances's (BCA) alert text

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**USFS Rattlesnake Project - Sand Creek area, BHNF Bear Lodge Ranger District,
Wyoming -**
scoping comments are due Monday, December 22
(FS's original deadline was extended)

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This proposed Rattlesnake timber sale surrounds Sand Creek Roadless Area. It goes from the Wyoming/SD border to the edge of the national forest on the West and north. To the south it goes south of Rattlesnake Canyon and includes Calvert Sacket Draw. Lots of "overstory removal cuts" of beautiful old pines are proposed. This area has a diverse landscape with lots of aspen/birch, oak, mixed stands & deciduous understory. It has rare plants & beautiful scenery & hiking trails in wild setting. -- According to scoping -- 94% of the pine stands are dominated by mature pines! They are adding roads. And cutting is proposed within the "roadless disputed zone" - where environmentalists & FS disagree on what are boundaries of the Roadless Area should be, thus this sale would reduce "de-facto" roadless area.

This sale would impact a beautiful & relatively wild area of Forest. Many groups have worked for years to protect this special area. ----

We hope that you write in and send comments on this proposed timber sale. The deadline for comments on this timber sale is Monday, Dec 22 and details on how to comment are provided below.

HOW TO SEND COMMENTS:

E-mail to: *bhnf@contentanalysisgroup.com*
with "Rattlesnake Project" in subject line
and remember to include your name and return address in your e-mail.

If you send by e-mail you can send until about 11:59 on Monday, Dec, 22nd
and still meet the deadline,

To mail by post, it should post marked not later than the 22nd, to:

*Rattlesnake Project,
c/o Content Analysis Group,
172 E. 500 S,
Bountiful, UT 84010.*

However this is "scoping" --- the early stages of planning! It's best to submit
comments on time, but if you miss the deadline, we suggest you still send in comments.

This is scoping, which means they haven't fully decided what to do yet, and want to
know what the public thinks the significant issues are. A draft and final EA will be done,
which should have at least 2 action alternatives and much more details on the project and
affected area. It will perhaps be ready in spring and another comment opportunity will
also occur and an appeal opportunity will be provided.

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SAMPLE COMMENTS ON RATTLESNAKE PROJECT

Some points to raise --

Ask that the Forest Service

- 1. Does not increase in the amount of open roads; rather close and obliterate roads
and convert old road templates to non-motorized trails and create large areas closed to
motorized travel;*
- 2. Protect the rare plants and their habitat from adverse impacts;*
- 3. Retain large diameter yellow bark trees and large diameter future snags --- have
a moratorium on cutting of larger diameter yellow-barks;*
- 4. Protect older dense pine stands so as to help protect and develop future old
growth stands on the forest and promote connectivity between old growth stands;*
- 5. Identify potential hiking trails and destinations and develop a hiking trail plan
that connects the Roadless Area to other special features and the special areas. Protect
the wild appearance, scenery and quietness of the areas we would be hiking through;*
- 6. Identify other large areas besides the Roadless area that have few roads and little
past logging experience and protect these as large back-country and late successional
forest areas;*
- 7. Provide a buffer of wild and primitive landscape around the roadless area;*
- 8. Identify high scenic areas and protect the scenery, including scenery only seen
from trails and not from roads;*
- 9. Protect water quality and wetlands, springs, seeps and streams and associated
habitats from adverse impacts;*

10. Identify and disclose location of mixed stands of pine and aspen/birch and pine and oak stands and provide for the retention of beautiful large diameter old yellow barks that may tower over aspen/birch;

11. Remove and prevent spread of noxious weeds;

12. Protect heritage sites;

13. Provide for timely removal of slash piles and the scars of slash piles.

WANT MORE INFO FROM FOREST SERVICE?

Information on this project is at the Black Hills National Forest's web pages under "Projects and Plans" link

- <http://www.fs.fed.us/r2/blackhills/>

or

http://www.fs.fed.us/r2/blackhills/projects/nepa/public_docs/rattlesnake_project/index.shtml

This web site provides color maps of the proposed timbersale , displaying proposed cuts and other values, and text discussion.

There is also "hard copy" of scoping document, that could be mailed.

For more information contact:

- Elizabeth Krueger's (Rattlesnake planner), e-mail address ekrueger@fs.fed.us, Steve Kozel is the District Ranger - 307-283-1361 Bearlodge District phone

Other Rattlesnak Project alerts -

Biodiversity Conservation Alliance (BCA) has an alert on their web page at <http://www.voiceforthewild.org> and its included in this e-mail (scroll down) .

The Norbeck Society has also created a Rattlesnake alert, It's included in this e-mail as text& is missing supporting graphics contact Mary Zimmerman <mmzmen@hills.net>605-342-2552. or Colin Paterson <cpaterson@gwtc.net> for an e-mail copy of the original. ---

How you can help-- on the ground

If you have knowledge of this area please contact Nancy Hilding at 605-787-6779. If you would like to have access to maps and information to explore and learn about the area, contact Nancy. Right now the area may not be very accessible except by winter sports, however in the spring and summer we could use people willing to do field work and take photos. Persons who may have scenic photos of the area or are interested in photographing it, please contact Nancy also (contact info at bottom of e-mail).

Below find PHAS's detailed background, if you want to skip it, scroll down for Norbeck Society and BCA's alerts, which will be in different text fonts.

PHAS DETAILED BACKGROUND

The Sand Creek vicinity is one of the few remaining primitive areas on this forest and is in a remote area of exceptional beauty and diversity, with rare plant communities. Beautiful canyons and streams and wetlands occur. There is a core roadless area surrounded by a buffer of lightly managed forest. The roadless area is special, but so is the surrounding "buffer area" -- while buffer has roads, it still has values of old growth pine/late successional landscape. The area has lots of older larger pines, and lots of aspen, birch and oak. Stand of mixed deciduous trees and pine and stands with a lush deciduous understory can occur. It has "unofficial" hiking trails that transverse a relatively wild landscape. It does generally does not have the "tree farm" look and feel that prevails in much of the Black Hills National Forest. Nor is the area full of in-holdings with buildings/people.

PHAS has had a long term campaign to protect the Sand Creek Roadless Area (SCRA) from development. We endorse eventual wilderness designation of the area. We have litigated and community organized to prevent mining of SCRA. We have worked diligently to insure that Wyoming protects the class one water quality of Sand Creek. We have communicated repeatedly with the Forest Service asking for protection for the area and appealed FS decisions that would effect it.

In the 70s and early 80s the SCRA was protected by its designation as an inventoried Roadless area via the RARE II process. The Wyoming Wilderness Act designated many areas in Wyoming as wilderness, but released the SCRA from roadless area protection. Subsequently about 1/3 of original RARE II area was logged, although as this was a first entry, most of the logged area retains yellow bark tree overstory. In the early nineties the Forest Service had plans to log more of the area, but scrapped the plans pursuant to communications with conservationists. In 1991 conservation organizations proposed wilderness protection for several areas in the Black Hills, including in the proposal the remaining two thirds of the former Sand Creek RA. During the Forest Plan Revision, the Forest Service re-inventoried the remaining roadless area and created new boundaries for it. But the "inventoried " SCRA has boundaries that are smaller than the conservation groups proposed, creating an official and protected (inventoried) area at the core with some unprotected edges. It did not recommend wilderness protection for the area and did not create management direction that adequately protected either the roadless area or the surrounding areas.

The roadless area rulemaking done by Clinton in his last days of office, does provide some protection to the inventoried SCRA. That rulemaking may be in legal and regulatory limbo, due to conflicting federal court decisions, but the BHNF Forest Service appears to respect the rule for now.

In 2002 and 2003 two timber sales were proposed that would have effected the area surrounding the inventoried roadless area -- the Cement and Welcome/Sand Timber

sales. Welcome-Sand proposal never made it to the final stages. Cement went forward in 2004 to approval and sale but was appealed by many groups and was litigated by Biodiversity Conservation Alliance. PHAS volunteers did lots of research both by paper and in the field of the Cement timber sale and helped find the lawyer. In spring 2006, during litigation the Forest Service withdrew the sale, thus making the litigation over it moot. However the Judge dismissed the case pursuant to FS assurances that the sale would not be revived.

CURRENT THREAT

Here we are in 2008 with a new proposed timber sale -- the Rattlesnake Timber sale with a 42,171 acre project area. It combines the previous Welcome/Sand and Cement timber sales into one larger proposed sale, although some of the proposed vegetative treatments are different.

This is a very special area. The forest service promotes the timber sale, once again using fear of fire and beetles to justify it. The area has relatively few houses and lots of aspen,-- aspen has lower susceptibility to fire than pine. 94 percent of the pine stands are dominated by mature pines; yellow bark pines have a lower susceptibility to certain types of fire. For years it has had some small spots of beetles here and there, that never take off with large spreading insect increase, which other areas of the Forest have seen.

What it does have is an exceptionally wild landscape for the Black Hills and a potential for a wonderful and beautiful back-country hiking experience with a roadless area at the core. In addition to the roadless area there is an area to the south of it that has not had logging for as long as the FS provided records to us; this area has lots of aspen and mixed pine/deciduous stands. The Rattlesnake TS area has the potential to provide "old growth pine" habitat and large old yellow barks -- a very important and "at risk" biodiversity element on our forest. However the proposed Rattlesnake timber sale threatens some of those trees and stands with "overstory removal" and shelterwood cuts and more roads.

The northern part of the project area is considered critical winter habitat for mule deer. Higher elevations provide habitat for white-tailed deer, elk, and turkeys. Mountain lions are found throughout the Boundary Fire area, in the northern portion of the project area. There are several northern goshawk territories. Black-backed woodpeckers, brown creepers, Black Hills redbelly snakes, American marten (transitory visitor), and finescale dace are all found within the proposed project area.

Sand Creek is a class one stream in Wyoming -- that means it has special values and has the highest water quality protection allowed under federal law.

There are seven sensitive plant species known to occur in the project area some include lesser yellow lady's slipper, northern hollyfern, and American cranberrybush.

The end point of the BHNF shelterwood timber system, is the eventual replacement of stands of towering yellow barks with stands of young immature black bark pines. The famous Jasper fire area had been extensively logged and was primarily comprised of stands of younger, immature black bark pines (Structural stage 3B). The younger immature pines can have closed canopies - that are at risk of crown fires, but can have little or less commercial value, thus how do you pay for their thinning?

One underlying question here is does all the Black Hills National Forest need to be like a tree farm, continuously logged/roaded and re-logged/re-roaded or do we set some

aside for wilder areas with no, little or lighter vegetation management and limited roads and little or no motorized recreation use? And if we set some back-country aside, where should they be?

ITEM # 2. NORBECK SOCIETY RATTLESNAKE ALERT

Rattlesnake Forest Management Project

Comments due (extended to) Dec. 22, 2008

Send comments to: bhnf@contentanalysisgroup.com

Review proposal at:

http://www.fs.fed.us/r2/blackhills/projects/nepa/public_docs/rattlesnake_project/index.shtml

This project is of *high significance* because of its inclusion of the Sand Creek Inventoried Roadless Area, and because it is, at this point, one of the most pristine and biologically diverse parts of the Black Hills.

Most of the Rattlesnake Project area (@42,000 acres) has not been logged in recent times. The area is isolated and does not have the impacts from roads and residential development so common in other parts of the Hills.

In terms of traditional recreational activities and preservation of uniquely pristine and biologically diverse areas, this part of the Black Hills offers potential that has not been adequately developed by the Forest Service. In fact, in the face of the potential of this relatively primitive area, the USFS has drawn up a proposal that will ensure that this large tract of biologically diverse public land is enrolled in near term and future logging projects (11,540 acres). Additionally, 150 miles of road work will be undertaken in this proposed project resulting in a net *gain* of total miles of road in the area.

While the Forest Service should be commended for the 5600 acres of planned prescribed burns included in the plan, other details raise serious doubt that appropriate consideration has been made in regards to *the value of the area as a larger, intact, pristine and biologically diverse landscape* - something that is rare in the Black Hills. Although reducing risk of wildfire and bug infestation are among the stated purposes of the project, *the Forest Service does not propose anything innovative i.e. preserving the oldest trees or creating many more meadows.* The proposed treatments are the same ones that have

likely contributed to the current bug/fire situation -- it adds many of these acres to the majority of Black Hills acres already enrolled in the vicious cycles of roads and logging.

The Norbeck Society has already identified much of this project area as one of several Walk-In Only Areas in our comments on the Travel Management plan for the Black Hills National Forest in November 2007. Existing roads have been proposed to be closed as indicated in the following excerpt from the comment document: Moreover, most of the old roads are currently covered with vegetation and have become somewhat naturalized and are great for walking on. Most of these would be subject to at least 'minor reconstruction, i.e. bulldozing. We are especially concerned about the proposed road construction. The addition of 2.7 miles of new roads, development of 6.3 miles of non-system roads, and reconstruction of 114 miles of system roads will affect the entire character of this area. In the project description, it is proposed to close all **new roads** following use. However, simple closure of roads is insufficient - such action is an invitation to use by off-roaders and invasive plant species. Any new roads ultimately deemed necessary for managing this area must be obliterated and restored with native vegetation.

This entire project area hosts many sensitive plants and animals, while many (but not all) of the 'High Probability' areas for sensitive species have been avoided in the Rattlesnake Project Plan, these areas become little islands in a sea of development and any idea of the larger area as an intact ecosystem is threatened. Commercial thinning and other management activities including cutting, skidding, decking, road building have direct effects on many species of plants and animals. These effects include compacted soil, litter removal, bared mineral soil, rutting, crushing and/or destroying vegetation. Indirectly, harvests can lead to changes in soil moisture, hydrologic function of the area, changes in vegetative composition of the understory (including the introduction of exotics into the area), changes in water and nutrient uptake by vegetation, and soil erosion. These types of effects have the most potential to impact sensitive plants and animals and their respective habitats.

The project area has unique qualities, including:

1. proximity to and inclusion of the Sand Creek Inventoried Roadless Area
2. wildlife and botanical diversity and sensitivity
3. a relatively pristine area far removed from development - rare in the Black Hills
4. old roads that are grass-covered, ideal and beautiful place to walk and enjoy nature
5. prime backpacking area approaching wilderness qualities

Object to:

1. high impact treatments in or near areas of high probability for sensitive species. Roads and weeds and erosion and/or changes in the soil associated with treatment areas could affect adjacent 'not-treated' areas and *would certainly* affect the integrity of the natural character of the larger area.
2. too many roads and new roads. Better to decommission some of the existing roads. The Black Hills is one of the most densely-roaded National Forests.
3. Commercial logging for sake of logging - commercial mills are full of lumber

today, housing starts have slowed. The value of the board feet does not compare to the pristine and biologically diverse values that this area holds. This is a special area.

4. the Rattlesnake plan overlooks and thwarts the potential for opportunities in the Black Hills for backcountry recreation. The Black Hills National Forest is subject to far greater impacts of man than any other western National Forest. As one of the most pristine and remote areas of the forest, this area should be seriously evaluated for potential for primitive recreational experiences. When compared to the Bighorn National Forest, the Black Hills has less than 5% of the amount of Wilderness and almost 6 times the use of its existing Wilderness areas. There is a demonstrated need for back country areas in the Black Hills.

5. Between the release time of this project for comments (November 2008) and the time when they expect to issue the draft EIS (March or April 2009), *there is nothing but closed roads and deep snow; it will be next to impossible for any one to access the area or view the actual ground there with any ease during this period of analysis and comment.*

The original "RARE II" (Roadless Area Review and Evaluation) inventory from the 1970's mapped a 'Sand Creek Roadless Area' larger than what appears on the map today - *parts were lopped off* along the current southwest and eastern edges. The Rattlesnake Plan now proposes lots of 'treatments' including 'Precommercial thins, commercial thins, Shelterwood seedcuts" (preps area for future logging), and more *in these 'lopped off' areas.*

ITEM # 3. Biodiversity Conservation Alliance', (BCA) - RATTLESNAKE ALERT

ACTION ALERT!

Black Hills National Forest: Rattlesnake Forest Management Project Threatens Wildlife and Sensitive Plants

Comments needed by December 22, 2008

The US Forest Service is proposing a timber and vegetation management project called the Rattlesnake Project in Crook County, WY approximately 10 miles east of Sundance, WY. This project, as proposed, is in the name of fire prevention and mountain pine beetle reduction.

The 42,171 acre project area contains landmarks that include Cement Ridge, Sand Creek, Boundary Gulch, Rattlesnake Canyon, and Cold Springs Creek. Cement Ridge and the Sand Creek area, in particular, provide scenic viewing and a unique assembly of rare plants and wildlife.

The project proposes a variety of timber and vegetation management schemes including timber harvest, thinning, and prescribed fire. Some of the prescribed fire activities are proposed for parts of the Sand Creek Roadless Area and near housing development or what has been called "wildland-urban interface."

The northern part of the project area is considered critical winter habitat for mule deer. Higher elevations provide habitat for white-tailed deer, elk, and turkeys. Mountain lions are found throughout the boundary fire area, in the northern portion of the project area. There are several northern goshawk territories. Black-backed woodpeckers, brown creepers, Black Hills redbelly snakes, American marten (transitory visitor), and finescale dace are all found within the proposed project area.

There are seven sensitive plant species known to occur in the project area some include lesser yellow lady's slipper, northern hollyfern, and American cranberrybush. BCA opposes the following aspects of this project.

- * Backcountry logging of tree stands that add no benefit to the protection of the wildland-urban interface.
- * Construction of four new NFS roads totaling around 2.7 miles.
- * Disorganized planning of prescribed fire plans in the Sand Creek Roadless Area. All plans for prescribed burns must be in phases and strategically planned.
- * A timber harvest of 11,540 acres in an area that has been logged in the past.
- * Cutting in the 4B or 4C class treestands, meaning old growth forest age structure.
- * Forest Service argument that timber management schemes will have any major impacts on lessening potential pine beetle infestation or wild fire.

To comment on the proposed action write, fax or email comments to:

Rattlesnake Project

c/o Content Analysis Group

172 E. 500 S.

Bountiful, UT 84010

Fax: (801) 397-1605

bhnf@contentanalysisgroup.com

Bearlodge District Ranger Steven J. Kozel is the responsible official for this project.

The comment period for requested comment has been set by **December 22, 2008**.

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Nancy Hilding

President

Prairie Hills Audubon Society

P.O. Box 788

Black Hawk, SD 57718