PROPOSED TESTIMONY OF
JIM MARGADANT, SOUTH DAKOTA CHAPTER OF THE SIERRA CLUB

Mr. Chairman and Members of the Subcommittee. Thank you for your invitation to appear before the Subcommittee and give testimony on the subject of forest health and management practices on the Black Hills National Forest. I have been a member of the Sierra Club since 1978. My activities with and on behalf of the Sierra Club began when I moved to Rapid City and joined its Black Hills Group in 1987. The Black Hills Group has been involved with Black Hills National Forest management issues since the Group's inception. I have been a member of the Black Hills Group's executive board since the early 1990s and have served as its Conservation Chair and its Chairman. In 2004 I was elected to Chair the South Dakota Chapter of the Sierra Club. The Chapter oversees the activities of all of the Sierra Club groups in the state of South Dakota.

In 2003 I was appointed to a position on the Black Hills National Forest Advisory Board, representing regional conservation group viewpoints. In appearing before this Subcommittee I wish to stress that I do not speak for or represent the views of the Black Hills National Forest Advisory Board, nor all the regional conservation groups that are stakeholders and interested in the Black Hills National Forest. My comments today are intended to represent what I would term to be a conscientious viewpoint held by members of the South Dakota Chapter of the Sierra Club – members from both eastern and western South Dakota. We have actively participated in the forest planning process for the Black Hills National Forest and advocated that the Forest be returned to a natural condition in order to increase biodiversity for its plant and animal species. The Sierra Club criticized the use of commercial logging on the Forest, contending that its continued use as a management tool aggravated the loss of biodiversity. We lost that agrument. Although the new 1997 forest plan reduced the annual cut on the Forest to sustainable yields, the Forest Service determined that commercial logging would continue to be a principal management tool on the Black Hills National Forest. We appealed the 1997 forest plan and although the majority of the forest plan was upheld, the Chief of the Forest Service remanded portions of the plan for further work. The Phase II Amendment to the plan, pertaining to biodiversity and species viability, is almost complete and, we understand, will be released this fall.

During the Phase II process a number of additional factors came into play which impacted the planning process. A prolonged drought settled in and, like other public lands in the West, the Black Hills National Forest began to experience large wildfires. The Forest also experienced a severe outbreak by pine bark and ips beetles. And, the Congress passed The Healthy Forest Restoration Act. These factors pushed the Forest Service into expanding the Phase II Amendment planning to deal with threats from wildfire and insect infestations. Commercial logging and thinning on the Forest remains a principal management tool. The Sierra Club recognizes that and accordingly it is our desire to see that the Forest Service utilizes that tool in ways that will move the Forest toward its historic natural condition and which will foster the biodiversity of plants and wildlife on the Forest . To that end, South Dakota Sierrans will continue to participate in Forest Service planning at the project level, and we will continue to seek accountability for agency decisions and their implementation.

At present, the Black Hills National Forest faces a number of problems. As a result of past logging practices and decades of fire suppression the Black Hills National Forest does not resemble its historic state. Over the decades management practices and logging have favored the ponderosa pine over other tree species, and the Forest has lost a large amount of it's aspen and burr oak components. Most of the large ponderosa pine, trees 20 inches or more in diameter at breast height, have been removed, and no inventory of existent stands of these large trees exists. The Forest is also lacking early successional stages. The pines have encroached to the point that the forb and shrub components of the Forest have been seriously diminished. Any fix is further complicated be the fact that most of the pine stands in the Forest have been converted to even-aged management stands. That is to say, the trees in the stands tend to be all the same age and height. Good commercial silviculture, but problematic when wildfire jumps into the tree crown and begins to run.

Insects and wildfire are moving to open the Black Hills National Forest. These are natural forces, however, there is concern among land managers, scientists, and stakeholders that because the Forest is so far out of balance, natural fire and insect infestations will not mimic the historic disturbance regime. The mosaics that are being created are too large.

The land managers and timber industry assure us that commercial logging can be used successfully to address the threat of wildfire and insect infestation; that logging projects can be designed to more closely approximate historic tree stand conditions on the Black Hills National Forest . We have seen this "new forestry" heralded in articles in the *American Forester* and newspapers in the western states over the last decade. However, the "new forestry" seems only to live through one project. We suspect that is because commercial logging and thinning do not lend themselves to applying the treatment on a landscape scale. Through no fault of the industry, the "new forestry" is apparently not commercially viable beyond the initial experimental project. The dilemma facing the Forest Service on the Black Hills National Forest is determining how to retain to big, commercially valuable, ponderosa pine trees while largely relying on commercial logging sales to move the Forest toward its natural condition and restoring biodiversity. In the Phase II Amendment planning we recommended the Forest Service add an additional structural stage classification for the large ponderosa pine trees to enable it to engage in

more precise planning for that component at the project level.

To achieve this management goal the South Dakota Chapter of the Sierra Club Make the following recommendations to this Subcommittee, and to its members as Representatives in the Congress of the United States:

1. To ensure that the Forest Service be adequately funded so as to enable all of the National Forests under its jurisdiction, not just the Black Hills National Forest, to fully implement and monitor their management plans. Too regularly we are being told the Forest's budget funding has been utilized for fire suppression rather than for management functions. Wildfire suppression requires a separate appropriation. We believe that long-term forest health demands this, especially if the agency continues to view commercial logging and thinning as the principal tool in preserving natural forest conditions and biodiversity.

2. That funding under the Healthy Forest Restoration Act be increased to enable the Forest Service to meet the legislative intent to reduce wildfire danger in urban interface areas. The funds appropriated were woefully inadequate to insure that the agency could meet this task. Meanwhile, the public labors under the perception that the danger is being alleviated. On the Black Hills National Forest the funding for thinning projects in the urban interface area were quickly used. Additional funds had to come from commercial timber sales, many of which were not in the urban interface areas and resulted in the continued harvest of our rare component, large diameter ponderosa pines.

3. That Congress ensure that the agency receives funding to enable it to carry out comprehensive resource monitoring on all National Forest units. Monitoring is critical to ensure forest health, especially given the desire of the land managers to move quickly in meeting perceived threats to forest health. That desire is finding fulfillment in current forest planning and "adaptive management" probably will be the management process of the future. In order to prevent this type of process from simply becoming a buzz-word or degenerating into a reactive management process, managers have to have the ability to gather reliable scientific information and data to formulate models in order to make predictions about impacts from alternative management practices. And, once a management practice is adopted, to monitor it and re-evaluate it while in place. The Black Hills National Forest is moving in this direction. Wisely the stakeholders and public are being encouraged to participate in the process through existing NEPA procedures. The Mystic District Ranger, Bob Thompson, has been especially careful to try to involve all stakeholders in the planning for projects on his district. What is needed now is scientific monitoring data to enable the stakeholders and the managers to define policy options and policy performance measures in the planning process.

4. We also need a firm commitment from Congress and the Administration to support and fund the Rapid City Unit of the Rocky Mountain Research Station. A new laboratory building for the Unit has been funded and is under construction, however, we are seeing the Unit's research scientists and technical support personnel being decreased and its mission curtailed, presumably because of budget cuts. It also appears that the Rapid City Unit is being relegated to producing surveys rather than generating research data in the field. Field research needs to be a part of the Unit's mission; it has historically gathered the research data and published scientific articles bearing on the region's public lands management issues.

Presently, the Unit has three scientists; we hear that the Unit staffing will be decreased by one scientist and one support technician in the near future. That corresponds with what we have heard with regard to staffing patterns in other Units of the Rocky Mountain Research Station. This is most disturbing as it indicates a willingness on the part of top-level administrators to remove or dilute science-based decisions at the forest planning level. Instead of cutting personnel the Rocky Mountain Research Station should be adding scientists and staff. The Black Hills National Forest is in the midst of a pine bark beetle epidemic, and there is no scientist specializing in forest disease and insects on staff at the Rapid City Unit. Research for the Black Hills National Forest is covered out of Ft. Collins, CO. The Rapid City Unit also lacks scientists specializing in soils and hydrology, topics of acute interest given the recent history of wildfire on the Forest. The managers on the Black Hills National Forest would profit from a closer proximity to scientists engaged in research on this Forest, especially if those scientists and their data could be called upon by the agency and stakeholders during the early stages of project planning. This staffing is essential if the agency intends to utilize adaptive management techniques on the Forest.

The South Dakota Chapter of the Sierra Club believes that no additional legislation is required to enable the Forest Service to responsibly manage the Black Hills National Forest . However, vigilance on the part of Congress to support the Forest Service with adequate funds to monitor and manage the National Forests is critical.

Thank you for this opportunity to testify.

Respectfully submitted,

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