



Neiman Timber Co., L.C.

P.O. Box 910 • Spearfish, South Dakota 57783
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February 12, 2021

Ron Hecker
Ashland Ranger District
PO Box 168
Ashland MT 59003

Re: South Otter Landscape Restoration Project

Mr. Ron Hecker:

Neiman Timber Company would like to thank you for the opportunity to review and comment on the South Otter Landscape Restoration Project. We are familiar with the project area through past management activities. We would like to recognize the US Forest Service's (FS) efforts to begin the scoping of this project while still finalizing the Custer Gallatin National Forest 2020 Land Management Plan. History has shown that large devastating wildfires will occur in this area if actions are not taken to move to a more resilient landscape. We recognize the efforts it takes to initiate a vegetative management project going through a plan revision and we applaud your efforts.

We also recommend the Custer Gallatin National Forest (CGNF) reanalyze whether or not this project falls under the Healthy Forest Restoration Act (HFRA). We believe it does.

Purpose of and Need for Action

Neiman Timber Company agrees with the purpose and need stated in the Scoping document.

Proposed Action

We provide the following suggestions, comments, and concerns in regard to the proposed actions as described in the scoping documents provided:

- We recognize that the project area has been significantly impacted by past wildfires. It is critical that all acres within the project area that can be treated to meet the desired conditions be included in the proposed action of this project.



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- Treatment Descriptions for Commercial Thinning with Regeneration Cuts and Seed Tree Cuts:
 - Increase the intensity of this treatment so the desired conditions can be reached.
 - Increase the percent of commercial size trees that can be removed to 70% to provide flexibility in implementation so the stands can be moved to a more resilient condition.
 - Remove "Following harvest, commercial thinning units would be considered fully stocked and canopy gaps would be minor." from page 8. Stands that are left fully stocked with minor canopy gaps will still be at high risk to wildfire and insect outbreaks, therefore, this will not address the purpose and need of the project area.
 - Change silvicultural actions to increase forest stand resiliency
 - Reduce the amount of group selection activities and include more even-aged management. Table 1 of the proposed treatments and strategies document indicates that the long term goal is to promote 2-3 story structures. This will lead to less resilient stands due to ladder fuels. These dry Ponderosa Pine sites are better suited for commercial thinning down to 40-60 sq ft basal area, more evenly spaced.
- Treatment Descriptions for Improvement Cuts:
 - We agree with the goal of these cuts.
 - Clarify that when stating "Following treatment, these areas would be considered fully stocked..." that this in regard to the understory.
- Using even aged silviculture treatments will reduce the susceptibility to catastrophic wildfires and insect outbreaks in the future when compared to multi-storied stands.
- Commercial treatments should include trees with a minimum DBH of 9".
- Trees from 7"-8.9" DBH trees should be appraised as POL and offered as Timber Subject to Agreement in the contract.

Transportation

- Reduce seasonal restrictions due to wildlife on temporary road and haul routes to provide flexibility and opportunity in operations. The temporary impact to wildlife from hauling should be weighed against the need for long-term resiliency of the habitat.



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Project Implementation

- Good job on detailing mortality limits in broad diameter classes from prescribed burning.
- Recommend completing all commercial treatments in the next 5 years.
- Prescribe burning should follow commercial treatments.
- Recommend including a Salvage Clause to allow for salvage of commercial products if a wildfire should impact the project area.

Summary

Neiman agrees with the need for this project. We appreciate the opportunity to continue to work with the FS to develop the best possible project.

Sincerely yours,

Paul Pierson, CF
Black Hills Operations Manager, Neiman Timber Company