



Norbeck Society

Steve Kozel, District Ranger
Chris Stores, Natural Resources Planner
Northern Hills Ranger District
Black Hills National Forest
2014 North Main Street
Spearfish, SD 57783

May 12, 2023

Re: Zeppelin Forest Health Project scoping

Dear Ranger Kozel and Planner Stores,

As part of our mission to advocate for sustainable use of public lands, Norbeck Society comments reflect a desire to support a management approach for the Black Hills National Forest (BHNF) that recognizes the imperative of protecting and enhancing the biocomplexity of forest ecosystems that serve and support growing numbers of people. A vision for long-term sustainability of all aspects of the land is paramount.

The Norbeck Society wishes to ensure that benefits flow perpetually to those who come after us. People in the future will rely on the graces of the Black Hills National Forest just as we do.

On the following pages, you will find our comments on the Zeppelin Forest Health Project scoping.

As always, we appreciate the opportunity to provide input to the USFS about the management of the Black Hills National Forest.

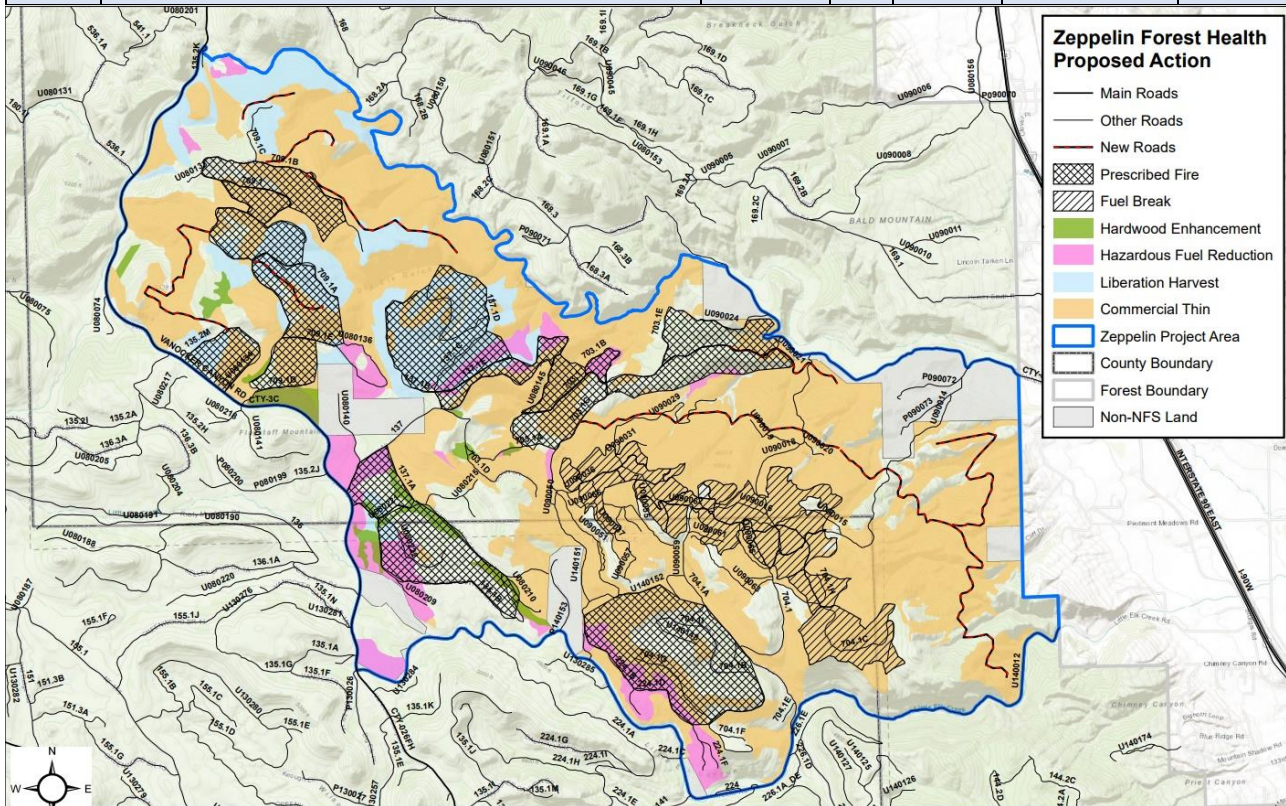
Sincerely,
The Norbeck Society

Norbeck Society Comments Zeppelin Forest Health Project Scoping

Northern Hills District, Black Hills National Forest

May 12, 2023

Zeppelin Scoping	<ul style="list-style-type: none"> Commercial and non-commercial thinning of up to 6,044 acres to reduce pine stand density and, subsequently, to reduce the insect risk and fire hazard rating of stands across the project area. Thinning operations would be carried out through a variety of methods including but not limited to ground-based or steep slope logging depending on terrain and accessibility of treatment units. Commercial shelterwood removal or liberation harvest on up to 1,117 acres to remove the overstory and allow for improved growth and yield, to create a mosaic of forest conditions, and to move these stands toward their desired future condition. Commercial and non-commercial removal of conifers on up to 181 acres of hardwood to limit conifer encroachment, provide habitat diversity, and enhance natural fuel breaks. Treatment type would be dependent on stand-by-stand conditions. Hazardous fuel reduction on up to 600 acres adjacent to values at risk. Treatment methods could include but are not limited to removal of woody biomass, lopping, chipping, crushing through mastication, piling and burning, and creating fuel breaks along egress roads and adjacent to private property. Fuel break creation and maintenance on 689 acres along the ridge dividing Elk Creek and Little Elk Creek. Prescribed fire on up to 3,204 acres to reduce fuel loading and continuity and to increase the quantity and quality of forage for big game and other wildlife. Prescribed burns would be conducted when weather and site-specific stand conditions allow. New road construction of up to 12.5 miles would be required to carry out all proposed commercial timber harvest treatments. Any new roads constructed under this project would be closed following use and would not be open to motorized travel by the public. 	Northern Hills District, BHNF	May 2023	11,103 acre area 10,336 acres of NFS land 8631 acres of commercial treatment (86%) and of that, 1806 acres OR or clearcut (18%)	EA Wildfire resilience Healthy Forests Restoration Act (HFRA, 2003) or Western Firesheds Emergency Action Determination (EAD) under Section 40807 of the 2022 Bipartisan Infrastructure Law (BIL)	Overlapping with: Spruce BHLR MPBRP Steamboat Unsuitable Base
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Introduction:

In these comments, we will identify opportunities, concerns, and issues as requested. We are disappointed that the scoping period did not include a time frame when roads into the area were open. Because of this, we were not able to view and gauge conditions of a large portion of the area in person. We requested an extension of the deadline, but it was not granted. We understand that we could still comment, but as time goes by, the comments are less useful to Forest Service.

Opportunities:

- Within the project area there is existing opportunity to conduct prescribed burning on recently logged areas without developing another logging project called Zeppelin.
- Within the project area, there is opportunity to identify mature and old growth forest as required by President Biden's Executive Order. Per Executive Order 14072, the Black Hills National Forest must evaluate the project area for old growth and mature stands before embarking on this project.
- There is little private land in this project area and consequently not much WUI. Much of this project area could be left alone, spared from soil damage, wildlife disruption, invasive plants, and motorized recreation.
- There is an opportunity to enforce a moratorium on cutting trees larger than 12" d.b.h. in the Zeppelin project area in order to attempt to conserve some of the natural capacities (especially fire-resistance) of the Forest to be restored.
- The scoping letter mentions the Zeppelin project as "necessary" because "The project area is within a landscape that is susceptible to insect and disease outbreaks." There is an opportunity here for the Northern Hills District to realize that the relative "safety" of an area from disease and insects depend on the larger landscape. Largely, the Black Hills are 'broken up' and they already have a 'mosaic of conditions.' There's a danger that Forest Service voids that (and forfeits an uncommon opportunity) by cutting down everything, thus making it all the same (no mosaic) again – a very serious issue related to the currently unsustainable BHNF Timber Program. Also, in forest ecosystems, disease and insects are an important part of a healthy ecosystem.

Also, note: In the 2020 South Dakota Forest Action Plan on page 9, it is stated, "The recent mountain pine beetle epidemic in the Black Hills and West has generated debate as to the effectiveness of management in reducing tree mortality. A unique opportunity has surfaced in South Dakota where a wilderness area is adjacent to a state park where various management techniques were used. The objective of this study is to quantify the effectiveness of various treatments in slowing tree mortality based on 1) stand density, 2) soil quality, and 3) tree growth rates. The data has not been fully analyzed yet, however no correlation has been found between tree mortality and soil quality, average diameter, or tree growth rates."

[2020 NationalPriorities5YearReview_FINAL.pdf \(sd.gov\)](#)

- Likely, an opportunity exists to employ uneven-aged management rather than the less acceptable (and more common) even-aged management.

- The project area presents a good opportunity to largely focus on aspects that strengthen the health of the area – understory thinning, preservation of large trees, connectivity of habitat, prescribed burning. This would go a long way to provide long-term stability of mature and old fire-resistant pines.

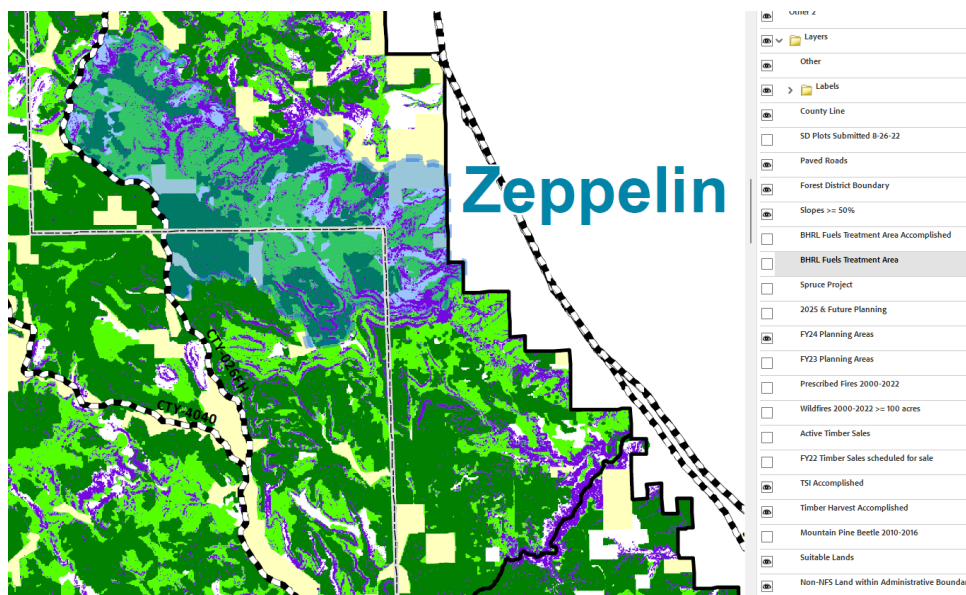
Concerns and Issues:

1. **Lead Balloon project: The Zeppelin project won't be completed as described to the public in your scoping letter and as a consequence will not meet project goals nor the expectations being set up for the public.** In a March 28, 2023 letter to Acting Supervisor Karchut regarding the Chimera Project, Lawrence County reports, "BHNH has indicated that they don't expect a lot of the acres proposed for precommercial treatment on steep ground will be treated and that prescribe burning will likely only occur on a "small percentage" of acres identified." [836 \(lawrence.sd.us\)](https://www.lawrence.sd.us)
We highly recommend that the Forest Service give the public the realistic picture of outcomes of the Zeppelin project - the Forest Service is obviously aware of the low likelihood that the most important aspects of the project will not be completed. There is an opportunity to change this disfunction: either tell the public the truth – the project will be ineffective – or, set stops at which no more commercial treatments can take place until a commensurate amount of restorative actions have been taken, i.e. small tree thinning and prescribed burning.
2. **Authority: EAD (Emergency Action Determination).** The problem with the EAD provision in NEPA is that it creates a loophole for the U.S. Forest Service to avoid conducting environmental impact assessments for their actions. There is no clear criteria or guidance for how this determination is made leading to arbitrary decisions that undermine the purpose and spirit of NEPA, which is to ensure that federal actions are informed by environmental considerations and public participation.
HFRA: can it be used repeatedly until the forest is gone?
3. **Current unsustainable timber program** is cause for great concern. Over-cutting the Forest is not acceptable environmentally, economically, or socially. It harms every other value on the Forest and also cripples the Forest Plan Revision process. How can the Northern Hills District ensure that the Zeppelin project will not be used to further violate MUSYA?
4. We are concerned about **Habitat Structural Stage Objectives**. What are the current HSS percentages, and what will they be at the end of the Zeppelin project?
5. **Degradation of the ecology of the Black Hills for no good reason.** Many areas of the Zeppelin project area just hosted heavy equipment in the Mountain Pine Beetle Response project and the Steamboat project. How are 77% "at risk for wildfire"? The Forest Service is strongly indicating that logging will not meet goals of the project. Impoverishment of the people to whom the Forest belongs, more and more small trees and a staggering loss of opportunity:



This photo shows what's happening due to recent "fire risk mitigation" in the Cougar Timber Sale area on the Northern Hills District immediately west of the proposed Zeppelin project.

6. **Steep slopes.** Damage and loss will be greater on steep slopes. We wonder what future you expect in the long-term for those area. Is the expectation that they are managed like a plantation? At a landscape level, where will the wildlife go then? Where will native plants that used to be common exist? Currently, on slightly steep slopes, logging creates ruts easily. How will this be mitigated? What will the criteria be for entering these areas with machinery? Many of these areas are on the "unsuitable base". Perhaps it would be constructive to include information about unsuitable base vs. suitable base as we would like to undrestand what we get for our tax dollars. What opportunities do taxpayers forego when logging is done on the unsuitable base as compared to the suitable base?



Steep slopes in purple. Also shown is a lot of unsuitable base and areas "treated" 2000-2022.

- 7. Other Concerns: Weeds, Hydrology, Soils, water table drops resulting from loss of forest, Botany and Wildlife (esp. NLEB and NOGO): we are concerned about loss and degradation of these many forest values.**

Conclusion:

Please take this opportunity to exercise stewardship of this area by retaining an older forest and all its components. Use understory thinning and prescribed burning to restore the kind of forest we know the Black Hills can be. Please do not sacrifice this area to unsustainable logging for short-term profit.

The Lawrence County March 28, 2023 letter to Acting Supervisor Karchut regarding the Chimera Project mentions a “statement by the BHNF during a Lawrence County NRC [Natural Resources Committee] meeting on Chimera Scoping where they [BHNF] stated that the BHNF “was not going to walk away from any timber.” [836 \(lawrence.sd.us\)](https://www.lawrence.sd.us/836)

We hope that the U.S. Forest Service does not exist just to shovel volume at an unsustainable rate to the mills at the expense of the American People and the long-term sustainability of all values of the Forest. Please show us you can do the right thing in the Zeppelin project area, and thanks for reading our comments.