



# Neiman Timber Co., L.C.

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May 12, 2023

Steve Kozel, Northern Hills District Ranger  
2014 North Main St.  
Spearfish, SD 57783

Re: Zeppelin Project

Mr. Steve Kozel:

Neiman Timber Company would like to thank you for the opportunity to review and comment on the Zeppelin Project. We believe the Black Hills National Forest (BHNF) is justified in deciding to put forth the efforts to implement vegetation management treatments to reduce the risk of a catastrophic wildfire and insect disease outbreaks in the project area. We continue to see unprecedented wildfires causing destruction to our forest ecosystems, water supplies and communities throughout our federal lands due to lack of management and climate change. The entire project area has been identified as a “high-risk fireshed” in the Forest Service’s 2022 Wildfire Crisis Implementation Plan. Therefore, we agree with the use of the the 2003 Healthy Forest Restoration Act (HFRA) and the consideration of the provisions of the Western Firesheds Emergency Action Determination with this project. The Fish Fire demonstrated how quickly a wildfire can threaten public and private lands and have devastating impacts on the ecosystems when high-risk stands are left unmanaged.

## **Purpose of and Need for Action**

Neiman Timber Company agrees with the primary purpose and need for action being “to increase the resiliency of forest landscapes to mountain pine beetle outbreaks and high severity wildfires by implementing vegetation treatments that would thin dense pine stands, create and maintain strategic fuel breaks, and contribute to local economies by providing commercial products and employment opportunities.” Implementing vegetation treatments to reduce stand densities both commercially and noncommercially together, has been proven to be an effective way to reduce the risk of a catastrophic wildfire. Even though there has been some past management within the project area, it is alarming that 77% of the project area is still at high or very high risk for wildfires.

## **Recommendations:**

### **Prescribed Fire (PF):**

We recommend areas that will be prescribed burned, receive mechanical treatments prior to prescribed burning. We also remind the BHNF of the “Prescribed Fire Mortality Direction” from BHNF Supervisor Van Every. The direction states the following:

*“The following letter contains Forest direction regarding mortality limits for prescribed fire planning and implementation. This direction should be followed until rescinded.*

#### **Mortality Limits**

- *Mortality limits should not exceed 5% in timber that is 7” dbh or greater in the suitable base.*
- *Mortality limits for timber less than 7” dbh, inside the suitable base will be determined based on approved silvicultural prescription.*
- *Mortality limits for all diameter classes outside of the suitable base will be determined based on approved silvicultural prescription.*
- *Determination of operable/inoperable ground should be made in consultation with Industry.*

*In addition, all approved Prescribed Fire Plans must be signed by a certified silviculturist and existing burn plans already approved should be amended to include the mortality limits identified above.”*

We request that the BHNF fully detail what the objectives of each of the PFs and under what silvicultural condition will trigger the PF to be implemented. Specifically, we would also ask what are the characteristics and conditions of the stands that will result in PF. These criteria should be in the draft EA.

### **Hardwoods:**

In this project, the BHNF is proposing commercial and noncommercial treatments to improve hardwood stands. We would encourage the BHNF to include post sale treatments to regenerate aspen where desired. Cutting the aspen clones is one way to reinvigorate the root systems. Prescribe burning can also be used effectively to kill or injure the above ground part of the aspen which cause the roots to sprout.

### **Pre-Commercial Thinning:**

The scoping document does not yet describe the proposed spacing of the precommercial thinning. Based on past history, we are concerned that the BHNF may precommercially thin some areas at too young an age class and also thinning to too wide of a spacing. While thinning to 16 foot spacing maybe appropriate to 5-inch trees

it is not appropriate to thin seedling and small saplings to this spacing. Young trees need a period of time to undergo competition to initiate apical dominance which inhibits the initiation and growth branches and concentrates the growth on the terminal leader. Thinning too early and to too wide of a spacing is going to produce trees that are shorter and have lower canopy base height and more canopy bulk density. The result is a forest with higher risk to crown fires and tree mortality. These stands will also be more susceptible to mortality from prescribe fires due to the lower canopy level and more ladder fuel.

#### Access:

We strongly encourage the BHNF to work with the State of South Dakota and local counties while determining access and layout. Both the state and counties may be able to provide aid in working with private landowners to gain access to some of the project area. We also recommend considering the use of Good Neighbor Authority where appropriate.

#### Analysis and Design Criteria:

It is paramount that the BHNF is successful in meeting the goals of the project for both forest resiliency and public safety. Therefore, we recommend that the Zeppelin EA uses an adaptive management approach when developing the project and design criteria. We recommend allowing flexibility in the implementation of the treatments and not designing the analysis around exact locations within the project area based on a database. Design criteria must also be descriptive instead of prescriptive.

#### Conclusion

We appreciate the work the BHNF is undertaking to carryout necessary treatments on the project and applaud the efforts for proactive management rather than reactive. We look forward to working with you throughout this project.

Sincerely yours,

*Paul Pierson*

Paul Pierson  
Black Hills Operations Manager, Neiman Timber Company



