

Black Hills Forest Resource Association

2218 Jackson Boulevard, Suite 10, Rapid City, South Dakota 57702 – (605) 341-0875

May 12, 2023

Steve Kozel
Black Hills National Forest
2014 N Main St.
Spearfish, SD 57783

Dear Mr. Kozel,

This letter is in response to the request for comments from the Black Hills National Forest (BHNF) on the scoping notice for the Zeppelin Forest Health Project (ZFHP). The Black Hills Forest Resource Association (BHFRA) and our members appreciate this opportunity to provide comments on this important project.

Overall, we support this project, the goals of reducing wildfire hazard and risk of insect infestation, and appreciate the BHNF recognizing the urgent need for treatment in this area. BHFRA also supports the use of HFRA authorities.

We have seen the tremendous benefits from previous management actions in this area during the Kirk Hill Fire of 2021. The previous harvest activities in the area where that fire began provided forest conditions that decreased the intensity of the fire and open/closed roads from that work provided access aiding the quick reactions from firefighters. This project presents opportunities to expand beneficial treatments in these high priority firesheds and should be implemented in a manner that provides protection to the forest and communities to the maximum extent possible.

Proposed Actions – Given the importance and priority of treatments within the project area, we strongly recommend the BHNF strive for the most comprehensive treatment area possible. We have some recommendations we believe may be helpful in achieving the objectives of this project:

- Provide flexibility to implement the appropriate treatment that corresponds to on the ground conditions. Due to a number of circumstances, the BHNF FSVEG database is not always up to date on every stand and may misrepresent actual on the ground conditions. This has resulted in some undesirable results in other projects. We strongly encourage the BHNF to design the project with this potential in mind and may include potential actions for given forest conditions.

- At this time, it is unclear what the species composition is throughout the project in entirety. To the extent that a spruce component exists and may require treatment to maximize achievement of the objectives in the project, we recommend not limiting treatments to “pine”. Example: “Commercial and non-commercial thinning of up to 6,044 acres to reduce *pine* stand density and...” (emphasis added)
- Although there may be valid reasons why 25 percent of the very high to high fire risk acres are not included in the proposed mechanical actions, it is unclear at this time what those reasons are. We encourage the BHNF to look for opportunities on the acres not included in the proposed actions and to communicate with the forest products industry on potential solutions to any operational or other hurdles that may exist.
- The scoping notice lumps commercial and non-commercial thinning activities together for a total of 6,044 acres. We would appreciate further information on individual activities, even if pre-commercial activities would be conducted concurrently or as follow-up activities in commercial areas.
- The proposed actions include 1,117 acres of overstory removal harvest. We strongly encourage the BHNF to not bind these activities to a specific structural stage and, instead, implement any overstory removal actions where a well-developed understory and/or secondary cohort is already established. This would exclude overstory removal in stands that contain only an overstory and seedling component.
- 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.

BHFRA appreciates the opportunity to comment and appreciates the BHNF taking the initiative to begin planning this important project. We believe the ZFHP is a critical project in a formally designated area or at risk communities and within the Wildfire Crisis Strategy. We recommend the BHNF treat this as the crisis it is and work with stakeholders to identify all opportunities to maximize the effectiveness of this project. We stand ready to help in any way and welcome any discussion as the BHNF works through the planning process.

Thank you,



Ben Wudtke
Executive Director