



Wyoming State Forestry Division

Office of State Lands and Investments



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Attn: South Slope Winter Burn Project
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To whom it may concern,

Wyoming State Forestry Division (WSFD) appreciates the opportunity to provide comments on the proposed South Slope Burning Project. We agree that there is a need to utilize prescribed burning as a management tool and commend the goals set by the Black Hills National Forest. The WSFD provides the following comments on the Forest Service's proposal to conduct prescribed burns on up to 8,382 acres within the Bearlodge Ranger District of the Black Hills National Forest:

- WSFD supports the use of prescribed burns as an effective method to reduce hazardous fuels, manage fire risk, and enhance ecosystem health. This proactive approach aligns with best practices in wildfire management and forest health maintenance.
- We commend the strategy to conduct burns in winter under specific conditions (e.g., snow-covered adjacent areas) to limit fire spread and reduce the need for constructed control lines. This method maximizes safety and efficiency while minimizing unintended fire damage.
- WSFD acknowledges the ecological benefits outlined, such as promoting diverse flora, improving wildlife habitat, and preparing sites for natural tree regeneration. These actions are crucial for maintaining healthy forest ecosystems.
- The detailed planning, including the preparation of Burn Plans, weather monitoring, and resource availability, is essential for the successful execution of the burns. The inclusion of multiple stakeholders is requested in the notification process, ensuring transparency and preparedness of neighboring agencies and communities.

- Targeting south-facing slopes, which are prone to higher fire risk due to their hot and dry conditions, is a strategic approach. By reducing fuel loads in these critical areas, the project aims to decrease the intensity of future wildfires and create safer conditions for fire management and less residual damage to timber resources.
- WSFD is in favor of reducing Rocky Mountain Juniper, a successional species that fills in forest understories, acting as ladder fuel and competing with more desirable tree species and grasses. Addressing the proliferation of this species can improve overall forest health and reduce wildfire risks.
- The prescribed burns target a 75% mortality rate for pine seedlings and saplings (up to 7 inches in diameter at breast height). We seek clarification on whether these units have been inventoried for stocking levels of this strata. Much of the Bearlodge area lacks adequate pine regeneration, potentially due to insufficient disturbance of the duff layer. Burning could enhance regeneration, but it's essential to ensure that reduction efforts do not drop stocking rates too low if adequate regeneration is present. An inventory to assess current stocking levels would help make informed decisions. It's crucial to consider the trees per acre (TPA) of this size class to avoid underrepresentation due to excessive mortality rates.
- We appreciate the efforts to protect sensitive resources, including ensuring compliance with best management practices and monitoring burn effects. Protecting tree roots and limiting mortality through winter burns demonstrates a commitment to sustainable forest management.
- WSFD encourages continued involvement of various agencies, highlighting the importance of a collaborative approach. This engagement helps address concerns and improve project outcomes through different perspectives and thought processes.

In conclusion, the Wyoming State Forestry Division endorses the proposed South Slope Winter Burning Project, recognizing its potential to reduce wildfire risk, promote ecological health, and ensure the safety of both the forest and surrounding communities. We encourage continued collaboration and thorough environmental assessment to achieve the desired outcomes. If you have any questions or wish to discuss any comments, please feel free to contact me.

Sincerely,



Kelly Norris
State Forester