DEPARTMENT of AGRICULTURE and NATURAL RESOURCES
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June 7, 2024

Steve Kozel
District Ranger
Black Hills National Forest
2014 N. Main Street
Spearfish, SD 57783

Dear Mr. Kozel,

The South Dakota Department of Agriculture and Natural Resources (DANR) has reviewed the Zeppelin Forest Health Project Draft Environmental Assessment. Based on the information provided, we respectfully submit the following comments for consideration.

DANR supports the purpose and need to increase the resiliency of the Zeppelin project area to future insect outbreaks and wildfires. DANR also agrees with the current assessment which suggests this area is at risk of future mountain pine beetle outbreaks and high-severity wildfires, and appropriate forest management activities are needed to reduce those risks.

The Black Hills National Forest is proposing to restrict tree cutting between May 1 and September 30 to limit impacts to northern long-eared bat and the threatened tricolored bat. This is the third project to impose several months of no harvest restrictions. This will negatively impact the forest products industry, limiting the ability to implement forest management that benefit northern long-eared bats in the long term.

The assessment on the northern long-eared bat fails to fully acknowledge positive impacts from the proposed vegetation management practices, does not adequately acknowledge the impact of white-nose syndrome on bat populations, and is imposing overly restrictive habitat protective measures when the bats' population declines are disease driven.

Many bat species prefer to hunt in small to medium-sized forest openings or gaps. Northern long-eared bats are slow fliers which seem to prefer feeding beneath the canopy, at around three to ten feet, above forested hillside, ridges, and over small pools beneath the forest canopy (Taylor, 2020). These conditions can be created through

forest management prescriptions. Shelterwood cuts create edges, foraging space, and a food source for insects. Group selection promotes a diverse forest structure and small to medium openings may promote insect prey for bats. Roosting habitat can also be maintained and promoted through green-tree retention and snag creation, in addition to no activity buffers placed around known roosts.

The US Fish and Wildlife Service Interim Standing Analysis (2023) states that forest management practices result in increased fitness through improvement of roosting, foraging, swarming/staging, and travel and migration habitat by reducing clutter, creating canopy, growing larger diameter trees, and maintaining larger diameter snags. Further, the US Fish and Wildlife Service concluded that habitat loss from forest management practices is temporary and reductions in fitness from habitat loss due to forest management is expected to be uncommon (US Fish and Wildlife Service 2023).

As noted in the US Fish and Wildlife Service Standing Analysis, the impact to the northern long-eared bat from prescribed fire is nearly double that of vegetation management practices. Reduced capacity in our forest products industry will likely result in wildfires that will be more detrimental to bats.

We recommend a revision be made to the Zeppelin Environmental Assessment to acknowledge that white-nose syndrome and habitat modification of the hibernacula are the greatest threats to bats in the Black Hills. We disagree with the claim on page 49 of the draft assessment that the two greatest impacts to bats are impacts to hibernacula and habitat modification. The US Fish and Wildlife Service' Species Status Assessment Report (2023) states that white nose syndrome is the greatest threat to the northern long-eared bat and that disturbance of known hibernacula through the Black Hills area is another threat to bat populations in the area (Tigner and Stukel 2003, p.54).

We support the full utilization of commercial products from the Zeppelin project and encourage the Black Hills National Forest to consider utilizing small roundwood, posts, and poles when assessing commercial vs non-commercial treatments and not limit any potential contracts that may be used to treat this material.

Finally, we recommend the proposed 8.7 miles of new road construction be decommissioned permanently after this project is completed.

In closing, DANR supports the Zeppelin Forest Health project with additional consideration placed on:

1. Protecting known maternity roost and hibernacula; for areas outside of the 0.25-mile buffer forest management activities should not be restricted;

2. The US Forest Service should acknowledge the value of silviculture prescriptions to providing habitat for bats;

3. The US Forest Service should acknowledge that white-nose syndrome and habitat modification of hibernaculum are the greatest danger to Black Hills bat populations;

4. The US Forest Service should utilize all commercial products from small roundwood to large sawlogs; and

5. The US Forest Service must permanently decommission all newly constructed roads upon completion of this project.

Thank you for the opportunity to comment on this project. Please contact Amanda Morrison at 605-394-2279 if you have any questions.

Sincerely,

Amanda Morrison

Amanda Morrison
Natural Resource Planner

Literature Cited:

Taylor, D.A, R.W. Perry, D.A. Miller, and W.M. Ford. 2020. Forest Management and Bats. Publication of the White-nose Syndrome Response Team (www.whitenosesyndrome.org), Hadley, MA.

Tigner. J.; Stukel, E. Dowd. 2003. Bats of the Black Hills: a description of status and conservation needs. South Dakota Department of Game, Fish and Parks, Wildlife Division Report 2003-05, Pierre, South Dakota, USA 94 p.

USFWS. Endangered and Threatened Wildlife and Plants; Determination That Designation of Critical Habitat Is Not Prudent for the Northern Long-Eared Bat. 81 Fed. Reg. 24707 (April 27, 2016).

USFWS. 2022. Species Status Assessment Report for the Northern long-eared bat (*Myotis septentrionalis*). Version 1.2. U.S. Fish and Wildlife Service. (https://www.fws.gov/sites/default/files/documents/Species%20Status%20Assessment%20Report%20for%20the%20Northern%20long-eared%20bat-%20Version%201.2.pdf). Bloomington, MN.

USFWS. 2023. Appendix A. Standing Analysis for Interim Consultation Framework for the Northern Long-eared Bat. U.S. Fish and Wildlife Service. (https://www.fws.gov/media/appendix-standing-analysis-interim-consultation-framework-northern-long-eared-bat), Bloomington, MN.