

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
phas.wsd@rapidnet.com
June 10th, 2024

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

Re: Zeppelin Forest Health Project scoping

Prescribed Fire

We support prescribed fire and thank you for planning it.

Hardwood enhancement and expansion of hardwoods:

Prairie Hills Audubon Society values mixed stands of aspen/birch and pine/spruce. Mixed stands, especially when near water provide excellent birding - with an abundance of different bird species found in one area. Mixed stands of aspen/birch and pine and/or spruce also provide excellent visuals, especially in foreground or midground views.

Often times the pines found in aspen/birch stands can be very large old growth trees, that have been left alone (uncut), due to cost or difficulty of cutting them. We fear the BBNF with its' years of unsustainable harvest, is converting to a younger forest and losing/reducing mature & large diameter yellow bark pines. We hope that any old, large and elegant yellow barks in aspen stands will be cherished and left alone.

We support conversion from pine to aspen stands in the WUI. Aspen are much less of a fire risk than pine. It seems idiotic to us to plan for endless managing of pine stands in WUI and not work towards conversion to aspen. We hope you do this by cutting circles of pine away from the edges of aspen stands and allowing aspen stands to grow outwards from the center. We do not support endless attempts to keep aspen stands static by removing "encroaching" pine from them. Let the aspen stands grow and let them encroach on and reduce the pine forest, especially in the WUI. Please support massive type conversion from pine to aspen in the WUI in the Black Hills. This will result in less need for a large timber industry.

Not-sustainable logging of the BBNF

The Forest Service should not be cutting in excess of 60,000 CCF per year, while we wait for the new Forest Plan. We believe if you considered all the other laws that govern forests – all the laws that govern wildlife and all the other resources' needs, you will want to cut less timber/year in the future and you will discover this via the new Forest Plan Revision.

Please fully disclose how this sale will contribute to the non-sustainable cutting of the Black Hills National Forest. We believe you are continually violating the MUSYA and the FSMA.

Old Growth

We think the forest-wide amount of SS 5 is .6 or .5 percent. The Forest Plan Objective is for 5% old growth.

In each timber sale the Forest must compensate for this shortage by saving all current SS 5 existing in the sale and creating temporary "place holder" fake old growth, by designating the oldest and most dense SS 4C and SS 4B as "place holder" old growth. You also need to designate future replacement old growth. Stands that you save and hold in reserve in case the current crop of 4C and 4B "place holder" fake old growth are lost in the future before or after they mature to actual SS 5.

When selecting SS4C and SS4B stands to be "place holders", you need to think about the needs of goshawks for nest stands and needs of other species that need mature and dense interior forests.

The draft EA states "No areas identified as old growth currently exist in the Zeppelin project area. During field review of the project, one area was identified that will be managed for old growth under the modified proposed action."

The Zeppelin project's plans to manage for .58% old growth is woefully inadequate.

Roads

Please disclose how much timber volume in Alternative B would be acquired by each additional mile of road and what are the costs associated with construction, widening and maintenance and what is the economic value of the timber volume accessed.

Liberation Harvest.

We are opposed to your "liberation harvest" as we believe this is just a decorative name to hide overstory removal. We believe there are not enough old yellow bark pines left and you are converting to a forest of young black bark pines.

Deer/Elk – Management Area 5.4.

Most of this sale is big game winter range. I did a search for "hiding cover" and "thermal cover" -- values you used to worry about for big game. I found nothing. Did I miss your discussion of the amount of hiding/thermal cover provided? Perhaps it is now expressed in new terminology? Or do you have new theories or rules that declare that cover is not needed by ungulates? Please include a section on hiding and thermal cover.

Black-backed Woodpeckers

Black Backed woodpeckers need mature forests that are burned in wild fires. Controlled burns & insect kill don't work for long term population viability. How will your unsustainable cutting and constant war against wild fire effect the viability of the black-backed woodpecker on the forest. What

do latest population estimates for the black-backed wood pecker show after the mountain pine beetle epidemic ended?

Interior Forest Species

Please discuss the impacts of Zeppelin on birds that need interior and dense forests. Please discuss impacts to birds that need large snags or large yellow barks.

Snails and bats,

Please include adequate discussion of impacts to rare snails and bats.

WUI

How much of the WUI actually surrounds private inholdings with buildings and how much of the WUI surrounds private inholdings without buildings?

Beaver

Please look for beaver and potential beaver habitat while you are out scouting the area. Please consult with hydrologists about streams that could use beaver dam analogs and consider leaving poles or other cut timber near appropriate spots that could be used to build beaver dam analogs. Please discuss dropping a spruce tree over a stream as a way to create a beaver dam analog in its' downward facing branches – could a fallen spruce , that humans augment with willows or other brush, woven into branches, create beaver dam analogs?

Sincerely,

A handwritten signature in black ink that reads "Nancy Hilding" with a stylized flourish at the end.

Nancy Hilding
President
Prairie Hills Audubon Society