

# Neiman Timber Company Comments re: Sawbuck Forest Management Project

February 20, 2025

Neiman Timber Company appreciates the opportunity to comment on the Sawbuck Forest Management Project. We support the Needs and Opportunities and offer the following comments from the timber industry perspective.

## Commercial Thinning Treatments

**Neiman supports and commends the inclusion of steep slope analysis for commercial treatment opportunities.** Thousands of acres of steep slopes on the BHNF, previously excluded, can be successfully harvested using existing timber harvesting equipment.

Additionally, beyond winch (or tethered) and skyline logging, systems like Cut-To-Length (CTL) can operate on slopes exceeding 50%, particularly where rock is not a limiting factor.

It is crucial that the Forest Service continues to consider the impacts of treatments on steep slopes within the broader context of mitigating soil loss, protecting water quality and habitat, and enhancing forest health and resilience against extreme wildfires and insects.

**We encourage the Forest Service to expand the project area considered for management via commercial thinning.** The proposed 4000 acres for commercial treatment represent less than 3% of the project area. Given the emphasis on timber harvest to achieve objectives in Management Areas 3.7 and 5.4 (totaling 12,901 acres) and the need to manage tree stands in area 5.1 (114,464 acres), this appears limited in scope for acreage treatment opportunities. Timber harvesting is also recognized as a management tool in Area 8.2 (4,845 acres) to protect and enhance developed recreation, contributing to the safe enjoyment of recreational areas.

Considering that 83% of the project area is dominated by ponderosa pine, mechanically thinning less than 3% of the pine over 9 inches DBH underserves commercial management opportunities.

Given the limited acreage proposed for commercial management despite frequent mentions of 'timber harvest' and 'commercial management' in project descriptions and objectives, we recommend the Forest Service provide a detailed map or table showing acres treated commercially and non-commercially, along with estimated commercial harvest volumes.

While the Forest Service frequently acknowledges limited timber availability in the Black Hills, it is concerning that opportunities for additional harvesting are not fully analyzed and utilized when they arise.

In times of uncertain budgets, it is worth noting that revenue generated from commercial timber sales supports other project objectives such as timber stand improvement (TSI), road maintenance and improvement, and fuels reduction efforts.

## Prescribed Burning

Neiman is concerned about the entire project area being considered for prescribed burning, while only 70% of the project area is being reviewed for vegetative treatments. This leaves 30% of the proposed prescribed fire area without vegetative treatments. We recommend

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adding project design criteria requiring all stands or areas planned for prescribed burning to be pretreated either commercially or non-commercially. This is particularly important because prescribed burning is not highly selective.

We recommend that well-defined silvicultural prescriptions should be established for all prescribed burns and summarized in the EA. Prescribed burning can have significant negative impacts if not properly planned and executed. Even under ideal conditions, the risk to designated leave trees is significantly higher with prescribed burning than with mechanical treatments. This concern also applies when the Forest Service attempts to use prescribed burning to thin regeneration.

In general, we support the use of prescribed fire as an important tool in management of fuels and forest health. We recommend the BHN plans, implements, and evaluates the impacts of prescribed fire with the detailed direction and rigorous analysis that is completed for other forest management activities.

Neiman offers the following recommendations regarding prescribed burning:

- Mortality limits must conform to the February 15, 2018, BHN letter regarding prescribed fire mortality.
- There should be zero mortality of trees over 16.0" DBH in old-growth stands and goshawk nesting habitat.
- Prescribed burning should not cause any stand currently meeting the Mehl 1992 definition of old growth to lose that designation due to the loss of trees 16.0" DBH and greater, the creation of openings, or both.
- Pretreatment of "doghair" stands within prescribed burn units should be required to reduce the likelihood of killing trees 7.0" DBH or greater or creating large openings.

Sincerely,

*Paul Pierson*

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Neiman Timber Company