

# Black Hills Forest Resource Association

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April 3, 2025

Attn: Buffalo Forest Health Project  
Northern Hills Ranger District  
2014 North Main Street  
Spearfish, SD 57783

This letter is in response to the request for comments from the Black Hills National Forest (BHNF) on the Buffalo Forest Health Project (BFHP). The Black Hills Forest Resource Association (BHFR) and its members appreciate this opportunity to provide comments in response to the notice for comments on the scoping notice for the BFHP.

We appreciate the efforts from the BHNF to implement forest management projects. We encourage the BHNF to continue those efforts and look for additional pathways to increase the program.

However, we have grave concerns about the BFHP as proposed. There are serious forest health needs that exist within the project area, but are not addressed in the BFHP and other stands proposed for treatment that should not be.

## Mountain Pine Beetle

There are more than 500 acres of stands within the project area with field notes referencing “growing pine beetle population” or other comments about established pine beetle infestations but are intentionally deferred from treatment simply because they are densely forested – the very forest conditions that support growing pine beetle populations. Although an epidemic at forest wide scales may not yet exist, we question setting aside susceptible forest stands to likely succumb to pine beetle mortality or, worse, fuel beetle populations.

Our estimate is more than 3,000 acres of susceptible forest stands in need of commercial thinning treatments within the project area that are being deferred from treatment. The vast majority of these stands are on easy to moderate terrain and could likely be completed through traditional 2400 contracts or IRTC without the need to fund specialized steep slope treatments.

## Proposed Treatments

Although shelterwood/overstory removals are a valid and needed step in managing ponderosa pine, imagery analysis suggests there are numerous forest stands proposed for this treatment in the BFHP that are not ready for this step. These stands generally have minimal regeneration or second story stand development that would warrant an overstory/shelterwood removal treatment. Treatment within these stands, that are not ready for an overstory/shelterwood removal, should be reconsidered and re-evaluated to ensure sound forest management practices are being implemented within the project area and not simply “checking” a minimum stocking of regeneration box.

Access is difficult this time of year and we don’t have a strong estimate of how many acres of the proposed overstory/shelterwood removal treatment should be dropped. Aerial imagery suggests more than a single stand and could possibly be up to 15-20 percent of the proposed acres of this treatment.

Prescribed fire is an important tool that should be utilized for maintenance between mechanical treatments on the BHNF. Treating stands before prescribed burning helps ensure firefighter safety, increases the likelihood of meeting burn objectives, and minimizes the potential for tree mortality. Although we recognize some stands may have been treated in previous projects, we are concerned that the acres of potential prescribed fire exceed the acres of mechanical treatments in the BFHP.

Like prescribed fire, BHFR strongly supports precommercial thinning activities on the BHNF and in the BFHP project area. Precommercial thinning activities should be implemented with an eye to the future development and productivity of the stand. Precommercial thinning activities should also be planned to minimize the cost per acre to maximize the number of acres treated.

### We Recommend:

- 1) Re-evaluate and analyze the BFHP to include dense stands at risk of pine beetle infestation and treat those stands through commercial thinning operations.
- 2) Re-evaluate and analyze the BFHP to remove stands proposed for overstory/shelterwood removal where that treatment would leave the majority of the acres only minimally stocked with early stages of tree regeneration.
- 3) Plan and articulate that prescribed fire would only be utilized in areas that have undergone mechanical treatments.
- 4) Clearly provide a detailed description of the burn objectives by acres and the post burn desired conditions by acres in text and maps.
- 5) Precommercially thin stands to no more than 12ft spacing.

The BHFRA and our members appreciate the opportunity to comment on the BFHP and sincerely hope the BHNH will take a moment to re-evaluate the types and locations of proposed treatments in accordance with our comments and recommendations.

Thank you,

A handwritten signature in black ink, appearing to read "Ben Wudtke". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ben Wudtke  
Executive Director