



**DEPARTMENT of AGRICULTURE
and NATURAL RESOURCES**

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RAPID CITY SD 57702-8160
danr.sd.gov

April 16, 2025

Shawn Cochran, Forest Supervisor
Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730

RE: Frass Forest Health Project

Dear Forest Supervisor Cochran,

The South Dakota Department of Agriculture and Natural Resources (DANR) has reviewed the proposed Frass Forest Health Project and respectfully submits the following comments for consideration.

DANR supports the project goal to remove insect impacted pine and replant the affected areas, however, we have concerns about the viability and timing of this project. Nearly two years have passed since the second pine looper defoliation event in this area. Because of the delay bark beetles and wood borers have already infested much of the standing dead trees diminishing the value of the wood for sawtimber. In the future, the Forest Service should respond more promptly to issues like this to enhance forest health and reduce adverse effects on sawtimber values.

The additional shaded fuel break treatments may offset some of the loss in commercial value and are needed treatments in this area – the Forest Service should take advantage of these to the maximum extent practical. The proposed fuel break widths should be applied to flat ground. Since fire activity intensifies as slope increases, fuel break widths on slopes should be increased to maximize effectiveness. Fuel breaks will also require long term maintenance and monitoring and should be included in the project's monitoring plan.

DANR is concerned that the project does not include adequate funding to address noxious weed impacts and recommends the Forest Service explore all avenues and partners to address this issue.

Finally, dense stands of live trees not yet infested should be thinned to decrease the opportunity of beetle expansion, decrease wildfire risk, and maximize commercial outputs. Based on a review of the project, we estimate there could be as much as 2,700 acres of additional opportunities available to help offset the cost of the project's non-commercial objectives. DANR recommends seeking additional opportunities to create tree stands that are more resilient to fire and insect outbreaks; thinning POL and

sawtimber stands to a 40 to 60 basal area will adequately address the insect and wildfire risk in this area. These opportunities should be thoroughly vetted and executed prior to project completion.

Thank you for the opportunity to provide comments on this project.

Sincerely,

Amanda Morrison

Amanda Morrison
Natural Resource Planner