

Black Hills Forest Resource Association

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

Due to the 7-day comment period, our comments are based on a cursory review of the EA but have taken every effort to provide as accurate comments as possible.

Although BHFRA appreciates the BHNF proposing the FFHP, we note that some of our members who were operating within active timber sales during the pine looper outbreak were denied requests to add volume of dead trees during the second year of defoliation. At least a portion of this situation may have been reduced if those requests had been approved and the work done at that time. We hope for closer collaboration should similar situations arise in the future so that we may work together toward improved outcomes for forest health.

Overall, we believe the BHNF has missed additional opportunities to improve and safeguard the well-being of the forest within the project area. The FFHP proposes to wait until the trees and forest have succumb to bark beetle mortality before taking action outside of fuel breaks. At that point, salvage will be the only option which will likely preclude many purchasers from utilizing the material – and thus precluding outlets for material from the BHNF.

The BHNF proposes to wait until the trees are dead despite acknowledging that, “Areas surrounding these insect-infested trees are estimated to have a high-to-very high risk or imminent insect infestation” and that “Approximately 76 percent of the project area has a high-to-very high fire hazard rating”. We also note the FFHP EA states, “Without action, it is very likely that these beetles (bark and other wood borers) will continue to increase and spread throughout the forest, putting forested stands on all lands at risk. As snags accumulate from this beetle attack, the risk of wildfire is also increasing, not only on NFS lands but also on surrounding private land.” The FFHP is also located in a priority fireshed within the Wildfire Crisis Strategy.

We agree with these statements from the BHNF in the FFHP EA and strongly suggest the BHNF proactively thin (sawtimber, POL, and non-commercial where possible) the broader project area to reduce susceptibility to bark beetle attack, reduce wildfire hazards, and increase likelihood of additional purchaser interest in the project. Although prescriptions would be developed on a case-by-case basis, we recommend residual basal areas in green stands of 60 sq ft (+/- 20 sq ft) based on scientific literature and first-hand experience with recent wildfires and insect infestations in the BHNF.

It should be noted that only 8.5 percent of the project area is on slopes more than 40 percent and likely wouldn't need specialized equipment, at high costs, on large acreages to complete proactive treatments instead of waiting for the bark beetles to leave the BHNF with salvage work.

Taking proactive action, instead of letting the forest die first, may also reduce the need for replanting in the project area by preserving living trees. This would likely reduce the future cost, also. As it stands, the BHNF is calling for replanting up to 13,112 acres of the 17,388 acres.

By taking action proactively, before bark beetle infestation, the BHNF will also be better positioned to be contributing to the goals for MA5.4 and MA5.43 found throughout nearly all of the project area.

BHFRA strongly encouraged the BHNF to reconsider the treatments proposed in the Frass project to: 1) Proactively treat (sawtimber and POL harvest with precommercial where feasible) the coniferous forest outside of the current salvage needs to reduce the susceptibility to insect infestation and lower wildfire hazards; 2) Retain the proposed salvage treatments within areas already heavily impacted by bark beetles and/or pine looper; 3) Retain fuel break treatments with an emphasis on reducing density enough to reduce insect susceptibility in addition to wildfire hazards; 4) Capitalize on prescribed fire applications in areas that have already been mechanically treated to increase likelihood of meeting burn objectives and firefighter safety.

BHFRA appreciates the opportunity to comment on the FFHP and looks forward to working with the BHNF to proactively improve forest health in the FFHP area and others.

Thank you,

A handwritten signature in black ink, appearing to read "Ben Wudtke", with a stylized, flowing script.

Ben Wudtke
Executive Director