



## DEPARTMENT of AGRICULTURE and NATURAL RESOURCES

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July 24, 2025

Patrick Champa,  
Northern Hills District Ranger  
2014 North Main Street  
Spearfish, SD 57783

RE: Comments on the Buffalo Forest Health Project

Dear District Ranger Champa,

The South Dakota Department of Agriculture and Natural Resources (DANR) has reviewed the modified Buffalo Forest Health Project and respectfully submits the following comments for consideration. DANR supports and approves some of the modifications made to the project and has concerns that the current mountain pine beetle (MPB) risk has not been addressed. Additionally, we support the use of the Emergency Action Determination.

Specifically, we approve of:

- The use of Flexibility of Treatments in the development and analysis of the project. We acknowledge that the possibility exists that the database of record may contain errors, and that actual ground conditions is what should determine the need and type of treatment is essential to providing for ecological diversity and forest resiliency. We hope to see this flexibility included in future Black Hills National Forest projects.
- The variety of silvicultural prescriptions being proposed. All are appropriate prescriptions for ponderosa pine. It is important that the right prescription is used at the right time in a stands developmental phase to meet the purpose and need of the project. Shelterwood Removal and Shelterwood Establishment should be used only when stands conditions dictate.
- Inclusion of 4B and 4C stands, these stands are most at risk for MPB activity and fire. Management activities should be used to increase tree health and vigor thereby increasing resiliency to potential threats.
- Correcting the database of record to more accurately reflect conditions on the ground.
- Increasing the acres of commercial and non-commercial thinning. We are pleased to see over 80% of the project area considered for treatment. This approach to project analysis; in looking at all stands and all needed treatments (top-to-bottom) will facilitate timely and financially efficient operations.

Items that still need to be addressed:

- Discussion on MPB: The final environmental assessment should discuss the existing MPB risk within the planning area, how the treatment will address that risk, and the potential effects a no action alternative may have on those identified acres.

Thank you for the opportunity to comment.

Sincerely,

*Amanda Morrison*

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