

Neiman Timber Co., L.C.

*P.O. Box 910 • Spearfish, South Dakota 57783
(605) 642-7741 • Fax (605) 642-5902*

Patrick Champa
Northern Hills District Ranger
Black Hills National Forest
2014 North Main St
Spearfish, SD 57783

Attn: Benchmark Forest Health Project

Dear Mr. Champa,

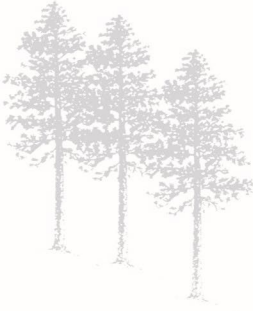
Neiman Timber Company, LC would like to thank you for the opportunity to comment on the Benchmark Vegetation Management Project (BVMP). We support that the Northern Hills Ranger District (NHRD) is considering a vegetative management project for forest health in this area and at the watershed level. Although this area has seen a variety of vegetative treatments and natural mortality events (Mountain Pine Beetle) over the past 30 years, there is still work that needs to be done in the project area for forest health and resiliency purposes.

Proposed Activities

Neiman Timber Company, LC (NTC) has been a primary partner with the Black Hills National Forest (BHNF) over the past several decades to carry out vegetative work within the BVMP area. As such, we are very familiar with the current vegetative conditions within the project area. NTC agrees with the Purpose of and Need for action stated on page 1 of the Preliminary Environmental Assessment and Finding of No Significant Impact (EA). We also applaud the supportive list of reasons as to why this project is necessary on page 1 & 2.

NTC offers the following comments for the treatments outlined in the BVMP:

- **Commercial Thin:**
 - We support the use of this silvicultural treatment in the BVMP.
- **Shelterwood Treatments:**
 - We support the use of these treatments as described in this section.
 - We recommend additionally referencing Forest Plan guideline 2411 to further clarify the CMAI statement.

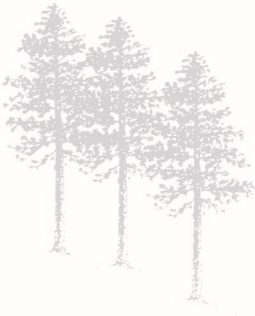


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- Additionally, we recommend that Forest Plan Guideline 2416 c is included when determining when stands are ready for Shelterwood Removal harvest.
- We support leaving reserve trees on microsites within a stand where regeneration stocking levels have not met at least 300 trees per acre if determined appropriate by the silviculturist.
- **Group Selection:**
 - We support the use of this silvicultural treatment in the BVMP.
- **Pre-commercial Thinning:**
 - We support the use of this silvicultural treatment in the BVMP with the following recommendation:
 - NTC strongly recommends a spacing of no more than 12 feet if QMD is less than 7”.
- **Hazardous Fuel Reduction:**
 - We support the use of this silvicultural treatment in the BVMP with the following recommendations:
 - We recommend only using the 16 to 20 foot spacing immediately adjacent to private and/or within a specific fuel break.
 - We would recommend a max spacing of 12-14 feet when not immediately adjacent to private if QMD is less than 7”.
- **Hardwood and Meadow Enhancements:**
 - We support the use of these silvicultural treatments in the BVMP.
- **Prescribed Fire:**
 - We support and applaud the use of prescribed fire as outlined in this section.
 - We support the direction to only implement the use prescribed fire “in areas that have received some form of prior vegetative treatment.”
 - Additionally, we would recommend including prescribed fire in the Sanitation/Salvage Harvest section.
 - We support tree mortality limits and recommend that mortality limits for prescribed fire be included in the design criteria like the direction by BHNH Supervisor Mark Van Every in a white paper he wrote for the forest on February 15, 2018. This letter addressed mortality limits for prescribed burning following a failed prescribed burn in 2016 that resulted in high overstory mortality. The direction included the following limits:

Mortality Limits



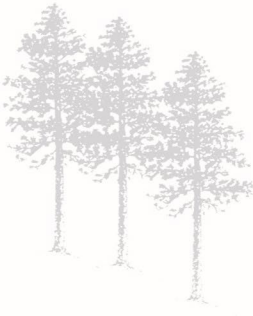
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- *Mortality limits should not exceed 5% in timber that is 7" dbh or greater in the suitable base.*
- *Mortality limits for timber less than 7" dbh, inside the suitable base will be determined based on approved silvicultural prescription.*
- *Mortality limits for all diameter classes outside of the suitable base will be determined based on approved silvicultural prescription.*
- *Determination of operable/inoperable ground should be made in consultation with Industry.*

In addition, all approved Prescribed Fire Plans must be signed by a certified silviculturist and existing burn plans already approved should be amended to include the mortality limits identified above."

- **Shaded Fuel Breaks:**
 - We support the use of this treatment in the BVMP.
- **Sanitation/Salvage Harvest:**
 - We support the inclusion of this section in the analysis and recommend including prescribed fire that exceeds mortality limits.
- **Flexibility of Treatments:**
 - We applaud the efforts by the NHRD to make every effort to ensure the right treatments are done in the right places. The inclusion of this flexibility in the analysis provides the necessary tool for personnel to make sure this happens during implementation.
- **Design Criteria (DC):**
 - Overall, we believe the design criteria is very well written and provides adequate protection measures to resources within the BVMP. We again applaud the work of the NHRD in developing the DC. NTC offers the following comment to strengthen the DC even a little more:
 - DC R-2 may be too limiting for practical implementation of the project as there are many motorized trails and possibly even non-motorized trails that may not only be able to be crossed at a 90-degree angle .



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Additionally, NTC has worked closely with non-motorized trail groups in the past and have come to a consensus that if a non-motorized trail needs to be used, the DC should state that the trail will need to be returned as close as possible to the pre-use condition.

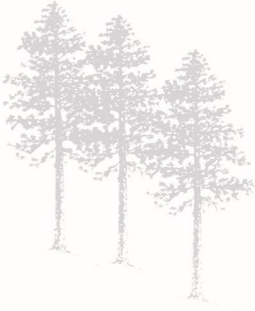
Environmental Impacts

NTC appreciates that the analysis includes the potential beneficial effects from implementing the proposed action. We also appreciate the potential negative effects if it is not implemented. We strongly recommend including the potential negative effects of catastrophic wildfire and insect outbreaks if the proposed action is not carried out.

- **Botany:**

- Commercial Timber Harvest:

- This section appears to be overly restrictive as it relates to yarding methods. NTC is concerned that as written, this section will reduce the likely that all treatments can be carried within the project. We recommend the following:
 - Change 4th sentence from “Whole-tree yarding will be utilized in the commercially harvested units to limit...” to “Whole-tree yarding will be the preferred yarding method in the commercially harvested units to limit...”
 - Broaden the scope of the use of cut-to-length (CTL) to include lop-and-scatter (LS).
 - Utilize more of an outcome-based model in the analysis so that Whole-tree yarding (WT) may be used on all slopes with limits to soil impacts. This would allow for WT yarding with a skyline crew on steep slopes.
 - Additionally, do not prescribe the % slope that would allow for CTL and LS as this contradicts the sentence above it stating that “Whole tree yarding is recommended for all commercial harvest treatments proposed with the exception where topography and



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other ground-based logging constraints exists.”

(emphasis added)

We appreciate the chance to submit comments on this project.

Sincerely,

Paul Pierson

Neiman Timber Company, LC