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Comments:

Attached please find comments from the Wyoming State Forestry Division on the BHRL Project



Wyoming State Forestry Division

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Forestry@wyo.gov

Matthew H. Mead
Governor

Bill Crapser
State Forester

October 30, 2017

BHRL Project
Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730

Dear Ms. Davy:

On behalf of the Wyoming Office of State Lands and Investments – Forestry Division, we would like to thank you for the opportunity to comment on the Black Hills Resilient Landscapes (BHRL) Project as a Cooperating Agency.

1 We support the use of Healthy Forests Restoration Act for this project and feel this is an appropriate and needed tool to move this project towards implementation. We would also like to thank the Forest Service for involving the Wyoming State Forestry Division (WSFD) as a cooperating agency, but would like to note that we are disappointed in the extent of limited project communication with our agency outside of the regularly scheduled National Forest Advisory Board Meetings. For a project this large and important, partnerships and outreach are key for success.

Prescribed Burning

2 WSFD would like to see more information pertaining to the prescribed burning activity, which has the potential to be implemented on up to 100,000 acres within the project area. Overall, we feel that prescribed fire can be an important tool to reduce fuel loading on the landscape, however fire can also have negative effects. Whenever possible, we would like to see prescribed fire be done in stands that have had recent mechanical treatments or some type of mechanical site prep done to help protect the residual trees (seed source) in previously infested stands.

Roads

- 3 Care should be taken when limiting the project to just 18 miles of new road construction given the potential duration and extent of the project. This may be all the roads needed to implement the project, but we would support additional flexibility that would allow for additional road construction if needed. The same holds true with the temporary road construction and allowing for additional miles of roads to ensure the project is able to have the flexibility needed to be as effective as possible. One option may be to provide an estimated annual extent of permanent or temporary roads, rather than a firm project total.

Planting

- 4, 5 We support the planting of pine trees on up to 5,000 acres on the forest and would like to see planted acres prioritized on the best sites. Additionally we support the use of mechanical site preparation whenever needed to help with seedling establishment in stands that are troublesome to regenerate.

Structural Stages

- 6 Per this summer's timber inventory meetings at the Black Hills National Forest Supervisor's Office that the Wyoming State Forestry Division was involved in, there was mention that the extent of SS5 stands were largely unknown and thus likely under represented. Additionally, it is uncertain how and what future stands will be managed for the 5% target of SS5, recognizing that there are other stands aside from just SS4C that can become an SS5 stand. We would recommend the Forest develop a matrix that would help to identify if and when a candidate stand would be managed as a future SS5 stand and how that decision will be made.

- 7 Also at the timber inventory meeting this past summer, it became evident that many stands throughout the forest may have an incorrect structural stage type. We recommend allowing these stands to be retyped as necessary and commercially treated if warranted.

Overstory Removal

- 8 A large portion of the project focuses commercial treatments in Structural Stage 4A stands with mention of retaining trees in groups of various sizes creating an overstory removal with retention treatment. To avoid management and regeneration issues, and to fully release the regenerated stands, we would recommend complete overstory removal that removes all sawtimber sized trees.

Uneven-aged Management

- 9 Uneven-aged management on page 11 has mention of perpetuating uneven-aged stands where they exist and initiate where appropriate. Moving potential stands towards an uneven-aged management regime will take a significant amount to implement, additional time to layout and mark and require even more intensive management to maintain over time. WSFD supports the idea of uneven-aged management, and feel there are situations where it may be appropriate, however we do have concerns over the resources needed over the long run to layout and manage. We also would like to see the rationale behind when and where a stand would be managed for uneven-aged management and who would make that decision. Page 32 also has more descriptions of the even-aged management activities, but fails to provide any acreage estimates or caps.

Again we would like to thank the Black Hills National Forest for allowing us the opportunity to comment on the Black Hills Resilient Landscape project and look forward to seeing it be implemented.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Crapser", with a long, sweeping horizontal line extending to the right.

Bill Crapser
State Forester