

# Black Hills Resilient Landscapes Project

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### Acronyms

BHNF	Black Hills National Forest
DEIS	Draft environmental impact statement
MA	Management area
MPB	Mountain pine beetle
SS	Structural stage

### Disposition 1. Issues Driving the Analysis

**Issue 1-1:** Proposed timber harvest and fuel reduction could negatively affect scenery, particularly in combination with recent timber harvest and MPB infestation.

Comment: Logging and associated activities could degrade scenery. (#11)

Analysis topics: Effects on scenic integrity, especially in landscapes seen from high-use sites such as public recreation areas.

**Issue 1-2:** The proposed action includes ground-disturbing activities that could increase noxious weed infestation. Added to the effects of a wide variety of past and ongoing activities, this could increase costs of weed treatment and displace desirable plant communities.

Comments: The project could further increase weed infestation. (#12)

Where necessary, log in the winter to minimize ground disturbance that can lead to weed infestation. (#25e)

Analysis topics: Potential acreage of weed infestation, associated costs, and effects on desirable plant communities.

**Issue 1-3:** Timber harvest could reduce landscape-level structural diversity by creating large, monotypic stands.

Comments: Promote “a healthy ecology through a mosaic of diverse vegetative conditions across the forest [that] will improve the resilience of the forest.” (#25b)

Avoid creating landscapes of continuous moderate- to high-density pine. (#27)

Avoid creating large, monotypic stands. (#43)

“We recommend silvicultural treatments should yield an irregular shaped mosaic of stand densities where possible. As a rule of thumb, stand, within-stand, or patch sizes

of about 0.2 to 0.5 acres and polygons with linear widths of about 50 meters represent minimum effective patch sizes for most wildlife species. Thinning patches to maintain low crown development is also encouraged within 100 meters of open areas capable of producing an understory with forage preferred by big game animals.” (#46)

Analysis topics: Size and distribution of forest patches that are similar in species and structure, age, or condition.

## Disposition 2. Issues Driving Modification of the Proposed Action

**Issue 2-1:** Protection of aspen regeneration

Comment: Proposed aspen regeneration may not succeed unless over-browsing/grazing is prevented. (#33)

Discussion: Leaving cut trees hinged has been a design feature on some BHNH projects and can be effective in protecting aspen if there are enough trees to hinge. Protective measures for aspen regeneration should be based on site characteristics. The proposed action has been modified to include this design feature, with allowance for site-specific conditions.

**Issue 2-2:** Large-diameter/old pine

Comments: Retain the remaining large and old trees; retain individuals and cohorts of large-diameter pine. (#20)

Discussion: The proposed action has been modified to include relevant design features regarding retention of large and old trees, which is an aspect of Forest Plan structural stage objectives (4.1-203, 5.1-204, 5.4-206, 5.43-204, and 5.6-204).

**Issue 2-3:** Commercial timber harvest in SS 4B pine stands

Comment: Reduce MPB infestation risk by thinning denser SS 4B stands while retaining at least 40% canopy cover. (#10)

Discussion: The Mountain Pine Beetle Response Project focused on infestation risk at the stand level and treated 4B and 4C stands for this purpose. The Black Hills Resilient Landscapes Project focuses on landscape-level resilience. Thinning moderately dense stands while keeping them moderately dense would be expected to have minimal effect on landscape-level resilience but may be useful in certain situations. As a result, the planning team has modified the proposed action to allow this type of thinning in the situations where it would be feasible and consistent with the project’s purpose and need.

## Disposition 3. Issues Driving Development of Alternatives

*Analysis of scoping comments did not result in identification of issues that would drive reasonable alternatives responding to the project purpose and need for action.*

## Disposition 4. Topics Included in the Purpose and Need/Proposed Action

**Topic 4-1:** Dense pine stands near developed areas

**Comment:** Do not create/maintain moderate- to high-density pine stands near developed areas. (#29)

**Discussion:** The proposal includes thinning of small trees and other fuel reduction near developed areas. The proposal also allows mitigation of active MPB infestation and fuel hazards in dense, mature stands near developed areas.

**Topic 4-2:** Good Neighbor authority

**Comment:** Include areas in Wyoming where Good Neighbor Authority could apply. (#40)

**Discussion:** The proposal applies to most of the National Forest System lands in Wyoming managed by the Black Hills National Forest.

**Topic 4-3:** Thinning of small trees

**Comment:** Fell and limb small, sub-merchantable trees where needed. (#1b)

Address the future hazards posed by dense pine regeneration. (#18)

**Discussion:** Addressing these hazards is part of the project's purpose and need. The proposal includes thinning of small trees.

**Topic 4-4:** Focus on structural stage objectives

**Comment:** Do not increase SS 5 from existing levels. (#3)

Do not limit the number of acres of SS 4A that can be cut. (#4)

Any movement toward structural stage objectives should be a by-product of other goals. (#10a)

Increase SS 5 beyond Forest Plan objective. (#21)

**Discussion:** Movement toward structural stage objectives is part of the project's purpose and need. These objectives are set by the Forest Plan. In recent years, structural stage conditions have moved away from the objectives due to mountain pine beetle infestation and response efforts. Infestation has now decreased, allowing renewed focus on moving toward structural stage objectives in keeping with the Forest Plan while increasing landscape-level resilience to beetle infestation, disease, and wildfire.

**Topic 4-5:** Threatened, endangered, and sensitive species, species of concern, and migratory birds

**Comments:** Conserve northern long-eared bat habitat. Apply identified conservation measures as appropriate. (#35)

Demonstrate how BHNF will ensure long-term viability of black-backed woodpecker. (#36)

Protect other threatened, endangered, and sensitive species, species of concern, and migratory birds. (#37)

**Discussion:** Providing a diverse and resilient forest is part of the project's purpose and need. The proposed action includes appropriate conservation measures and the analysis will disclose effects on these species.

**Topic 4-6:** Climate change

Comment: Consider management plans that take into account resilience to drought and rising temperatures that may be caused by climate change. (#25g)

Discussion: The project's emphasis on resilience is based on Forest Plan goals and objectives that are relevant to possible effects of climate change, such as addressing pine regeneration and other understory vegetation, maintaining grasslands and hardwoods, reducing fuels, and maintaining a diversity of pine stand structures.

**Topic 4-7:** Benchmarks and monitoring

Comments: Identify benchmarks of success and monitor achievement. (#25h)

Discussion: The proposed action includes objectives and monitoring of accomplishments.

**Topic 4-8:** Selection of stands for designation as SS 5

Comments: "Remove any areas currently designated as late succession in the applicable MAs that no longer meet management objectives." (#7e)  
"...dense stands of large diameter pine are highly susceptible to MPB infestation. The Forest should develop a long term, science-based plan for these stands that establishes and maintains conditions consistent with lower risk of infestation and mortality. Previously identified late succession stands, regardless of current condition, should continue to be managed for these characteristics rather than designating new stands." (#10b)

Discussion: When the BHNH revised its Forest Plan in 1997, "late successional" pine stands were identified and mapped. Many of these stands no longer possess late succession characteristics. The proposed action would identify the 1997 stands as existing or potential late succession and also identify other stands with late succession characteristics.

**Topic 4-9:** SS4B and 4C understory treatment

Comment: "Thinning from below would open the understory and reduce ladder fuels and beetle and wildfire risk, but retain characteristics of those stands with large-diameter pine." (#33a)

Discussion: Fuel reduction treatments often accomplish the same objectives as thinning from below. These treatments are usually funded by appropriated dollars and are relatively expensive on a per-acre basis. Therefore, efforts focus on wildland-urban interface areas and along egress routes. Broadcast prescribed burning may also have this effect and is proposed primarily in non-interface areas.

**Topic 4-10:** Stand-level structural diversity

Comments: "Increase use of uneven-aged management ('clumpy-groupy') in pine stands to increase diversity in the desired 'mosaic' of vegetation across the forest." (#25c)  
Retain existing uneven spacing and variable density. (#30)  
Do not convert even age stands to uneven. (#31)

Discussion: Implementing uneven-age management in appropriate stands (those with some existing uneven-age characteristics) is standard silvicultural practice. Irregular or "clumpy" spacing may occur in uneven-age stands but also in even-age or two-age stands. Proposed treatment prescriptions would result in a variety of age distributions and spacings, depending on stand conditions.

**Topic 4-11:** Jasper wildfire area

Comment: Conduct commercial timber harvest in the Jasper wildfire area. (#6)

Discussion: In August 2000, the Jasper wildfire burned more than 80,000 acres in the southern and central Black Hills. Most of the burned area is still in structural stage 1 (grass/forb). The remaining mature pine stands are near the center of the burned area, isolated from other forest. Some of the stands are in management area (MA) 5.1, where dense, mature forest is below Forest Plan objectives. Thinning these stands would not move conditions toward the objectives. Others are in MA 5.4, where this project would allow a certain amount of thinning in dense, mature pine stands.

**Topic 4-12:** MPB infestation risk

Comment: Focus on reducing MPB infestation risk by treating SS 4B and 4C stands. (#2)

Discussion: Mountain pine beetle infestation risk has decreased in most areas of the Black Hills. The proposal includes mitigation of active infestation as needed in remaining dense pine stands. Structural stage 4B and 4C acreages are below Forest Plan objectives in most management areas, so the proposal does not include widespread treatment of these stands.

**Topic 4-13:** Minimum treatment acres

Comment: Include goals for minimum treatment acres. (#25f)

Discussion: Treatment goals are outlined in the Project Description and Request for Comments document. Actual accomplishments depend on varying factors such as weather, changing stand conditions, fire season characteristics, budget, and Forest Service national, regional, and local priorities.

## Disposition 5. Topics Already Decided by Law, Regulation, Forest Plan, or Other Guidance

**Topic 5-1:** Project design

Comment: Make design features flexible and do not prohibit activities in a given area. (#14)

Discussion: Proposed activities are designed to meet Forest Plan standards and guidelines and other direction. Certain activities must be prohibited in specific areas when necessary to comply with law, regulation, or direction. Proposed activities are designed for implementation flexibility when possible and appropriate.

**Topic 5-2:** Forest management

Comment: The comment letter expresses an objection to forest management, citing a recently published book. (#17)

Discussion: Achieving Forest Plan objectives requires various types of forest management; these are based on scientific research, often conducted locally.

**Topic 5-3:** Wetland protection

Comment: Protect wetlands. (#38)

Discussion: Law, regulation, Forest Plan direction, etc. require protection of wetlands.

**Topic 5-4:** Livestock grazing

Comment: Do not defer grazing after prescribed fire. (#39)

Discussion: The commenting party requests no deferral of grazing after prescribed fire. Forest Plan guideline 4107 requires deferral if necessary to ensure revegetation.

**Topic 5-5:** Big game foraging areas

Comment: Specific recommendations on big game foraging areas: "Clear cut openings, meadow creation, and thinly stocked patches (less than 60 ft<sup>2</sup>/acre) can provide excellent foraging areas for ungulates and other species. These open areas should be at least 0.5 acre in size, be within 100 meters of dense pine stands (100 ft<sup>2</sup>/acre, or at least 55% canopy cover), not be bounded or bisected by roads if possible; and roads buffered by at least 200 meters, but preferably 400 meters of moderate to dense timber stands (greater than about 85 ft<sup>2</sup>/acre)." (#47)

Discussion: The Forest Plan includes direction regarding forage production. Due to recent MPB infestation, openings are not currently a limiting factor.

**Topic 5-6:** Understory hardwoods

Comment: Specific recommendations on managing for understory hardwood species: "In locations where wildfire control is an issue, open stands (less than 70 ft<sup>2</sup>/acre) of pine that foster understory growth of more fire resistant hardwoods should be encouraged. Similarly open pine stands should also be created in more mesic locations to encourage understory growth of deciduous trees and shrubs." (#48)

Discussion: Open pine stands dominate most of the BHNF at the current time (see Project Description and Request for Comments document, page 1).

**Topic 5-7:** Avian habitat diversity

Comment: Specific recommendations on managing for bird habitat: "To sustain and increase avian diversity, maintain within and between stand structural diversity to provide habitat needs of birds during both the breeding season and winter." (#49)

Discussion: This recommendation is similar to Forest Plan goals for the management areas included in the project area.

**Topic 5-8:** Snag retention

Comment: Retain appropriate trees for cavity-dependent wildlife species. (#32)

Specific recommendations on snag retention: "at least 1 or 2 large snags per acre, and a number of snags less than 6" dbh." (#50)

Discussion: These recommendations are similar to Forest Plan objective 211 and standards 2301, 2304, and 2305. There are no objectives related to small snags, but 2011 Forest Inventory and Analysis data showed a distribution of snags across all diameter classes. When small trees are thinned, dead trees are left standing. See also standards 2301 and 2302.

**Topic 5-9:** Turkey habitat

Comment: Specific recommendations on turkey habitat: "...stand densities of 60-70 ft<sup>2</sup>/acre are appropriate for late spring to fall... In areas with wintering wild turkeys, ponderosa pine stands should be managed for a basal area of at least 85 ft<sup>2</sup>/acre." (#51); "Turkey roost habitat typically requires stands with a basal area of at least 100 ft<sup>2</sup>/acre." (#51a)

Discussion: These recommendations are similar to Forest Plan guideline 3205. Proposed activities altering overstory basal area would occur primarily in open stands (less than 60 square feet per acre), meaning that the project would not affect overstory basal area in most of the stands that the comment describes as preferred turkey habitat.

**Topic 5-10:** Slash disposal

Comment: Specific recommendations on slash disposal: “thinning and logging slash should be chipped and spread, or piled and burned. Burned piles should be spread, dragged or disked, and planted with seed mixes designed to benefit wildlife by providing perennial food sources and/or cover.” (#52)

Discussion: The Forest Plan includes requirements for activity fuel disposal and revegetation of disturbed areas.

**Topic 5-11:** Noxious weed control recommendations

Comment: Specific recommendations on noxious weed control: “Noxious weed control should occur where slash piles have been treated and where soils are disturbed by silvicultural activities.” (#53)

Discussion: This recommendation is similar to Forest Plan objectives 230 and 231 and standard 4301.

**Topic 5-12:** Retention of small slash piles

Comment: Specific recommendations on retention of small slash piles: “Leaving smaller slash piles (less than 8' diameter) of untreated slash in some areas can be beneficial for creating foraging locations along with hiding, denning, and nesting cover for a variety of mammals, reptiles, amphibians, and birds.” (#54)

Discussion: This recommendation is similar to Forest Plan guideline 2307 and standard 3117.

**Topic 5-13:** Aquatic resources

Comment: Specific recommendations on guidance documents for protection of aquatic resources. (#55)

Discussion: Incorporation of these guidance documents is standard procedure.

**Topic 5-14:** Non-system trails under special use permit

Comment: Proposed timber harvest could damage trails, requiring an investment on the part of the users to repair. (#15)

Discussion: National Forest System trails are considered protected improvements under the timber sale contract. Non-system trails with officially permitted uses may also be considered protected improvements. Identification of improvements needing protection occurs during the interdisciplinary validation process that takes place prior to implementation. User-created, unpermitted trails will not be protected.

**Topic 5-15:** Fuel treatment planning

Comment: “Seek collaboration with communities and individuals on project that aim to reduce fuel loading.” (#25i)

Discussion: BHNF collaborates with its National Forest Advisory Board and involves county governments, state fire and wildlife agencies, and other entities in management activities.

- Topic 5-16:** Forest Plan revision  
 Comment: Revisit SS objectives in next Forest Plan revision. (#28)  
 Discussion: Regulations governing National Forests require periodic revision of Forest Plans. The next revision of the Black Hills Forest Plan is currently scheduled to begin in 2022. Forest conditions at that time and other factors will determine whether structural stage objectives are revisited.
- Topic 5-17:** Susceptibility of late succession stands to disturbance  
 Comment: “Only consider stands already at very low stocking rates to reduce future susceptibility to insect epidemics and high severity wildfires.” (#7d)  
 Discussion: The Forest Plan provides for both open- and closed-canopy late succession stands (p. Glossary-38). The draft environmental impact statement (DEIS) for this project will disclose effects of proposed late succession management.

## Disposition 6. Clarifications

- Topic 6-1:** MPB infestation effects on fire risk (the likelihood of fire occurring)  
 Comment: MPB trees with red needles do not increase likelihood of wildfire. (#1)  
 Discussion: The project purpose and need regarding MPB-killed trees is to address the potential for severe fire effects and suppression difficulty associated with surface fuels (fallen MPB-killed trees). See Project Description and Request for Comments, page 3; this document does not claim that standing, red-needle trees increase the likelihood of wildfires.
- Topic 6-2:** Commercial timber production level  
 Comment: Proposed commercial timber harvest could result in an inadequate supply of timber to support the existing local timber industry. (#7)  
 Discussion: The project’s estimated commercial timber output is a result of the actions being proposed to move conditions toward Forest Plan goals and objectives. The Project Description and Request for Comments document states the project life would be approximately 10 years, but if additional needs that would result in commercial timber harvest are identified during that time, another project could occur.
- Topic 6-3:** Increase aspen, birch, and oak  
 Comment: “In order to maintain 92,000 acres of aspen, the Forest should be regenerating 1,000 acres per year (10,000 acres over the expected life of the project), either mechanically or naturally through fire. The project anticipates only 5,000 acres of aspen regeneration over the life of the project. This amount is insufficient to maintain the desired quantities of aspen in a healthy condition.” (#8)  
 “In order to move closer to the Forest Plan objective for aspen acreage, the Forest should consider increasing the acreage of pine removal from aspen beyond the anticipated 6,000 acres.” (#9)  
 Increase aspen, birch, and oak. (#22)  
 Discussion: BHNF has accomplished aspen regeneration clearcuts on very few acres in recent years. In past decades, aspen regeneration was more widely practiced, but current conditions do not show that there is a need for more than the proposed acreage of regeneration to maintain healthy aspen stands.

The purpose of proposed removal of pine from aspen and oak stands and inclusions is to enhance existing aspen clones and oak stands rather than to increase acreage of stands with aspen or oak cover type. Increases are not necessary, since reinterpreted vegetation data show BHNF is already close to meeting the objectives.

Management of birch is not part of the project's purpose. Forest Plan direction is to "conserve and manage" birch, and this project would generally conserve and incidentally manage birch.

**Topic 6-4:** Prescribed fire on Bearlodge District

Comment: Include prescribed fire on Bearlodge Ranger District if not already planned. (#42)

Discussion: This project does not propose new prescribed burns on Bearlodge District because prescribed burn units authorized under previous decisions are still pending implementation. These previously authorized burns are displayed on Map 6 in the Project Description and Request for Comments document.

**Topic 6-5:** Forest Plan amendment for SS 5 designation

Comment: "Unclear if designating additional areas of SS5 would require a Forest Plan amendment; presumed the acres of MA 3.7 is assigned specific acres under the Forest Plan." (#7a)

Discussion: The proposal includes increasing acreage of SS 5 toward Forest Plan objective levels in MAs 4.1, 5.1, 5.4, 5.43, and 5.6. These areas are different from MA 3.7 (late succession landscapes emphasis). No Forest Plan amendment would be necessary.

**Topic 6-6:** MPB infestation risk across BHNF

Comment: "...as much as half of the BHNF is still at high risk for MPB infestation and mortality...54% of the treed area of the BHNF is identified as 'at-risk' for extensive basal area losses, or approximately 786,000 acres." (#7b)

Discussion: According to vegetation analysis completed for this project, the five management areas that make up 89 percent of the BHNF include approximately 268,923 acres of structural stages at elevated risk for mountain pine beetle infestation (stages 3B, 3C, 4B, 4C, and 5 pine) (30 percent of the total pine acres in these MAs).

**Topic 6-7:** SS 4A stands left out of proposal

Comment: "...many areas of 4A stands were excluded from possible treatment...there is no explanation of why these areas have been excluded...west of the Hwy 14A/85 intersection and around Reynolds Prairie." (#7c)

Discussion: SS 4A stands that were removed from commercial treatment consideration either have very few mature trees per acre (often due to MPB infestation) or are in fiscal year 2016-2018 timber sale cutting units, inaccessible, or on ground known to be unstable or inoperable. Non-commercial treatments may still take place in many of these stands.

**Topic 6-8:** Clearcutting aspen

Comment: Clearfell-coppice harvesting of aspen is a proven method of encouraging new growth production from aspen root suckers in some areas but is not a recommended treatment in the Black Hills. (#33c)

Discussion: The BHNF follows aspen treatment recommendations in RMRS-GTR-97 (Shepperd and Battaglia 2002). Recommended techniques for regenerating or expanding existing clones include removal of competing conifers, protection of existing and new suckers,

and stimulation of new suckers. Removing conifers growing in and around an aspen clone can reduce competition for moisture and light, which will favor the aspen.

**Topic 6-9:** Distribution of SS 4A stands

**Comment:** There doesn't appear to be an excess of SS 4A stands, at least on Bearlodge District; "we recommend including clarifications on how stand determination was made and mapped." (#45)

**Discussion:** The MPB epidemic affected fewer areas on Bearlodge District than in the remainder of the BHNF. Structural stage objectives apply across management areas, which cross district boundaries.

**Topic 6-10:** Characteristics of trees retained for cavity-dependent species

**Comment:** "Pine with large, platy bark, cavities, broken limbs and large-diameter branches should be retained for cavity dependent species; brown creepers and tree-roosting bats including the listed Northern Long-Eared Bat." (#33b)

**Discussion:** Retention of such trees is generally standard procedure. Most timber sale marking guides include similar language.

**Topic 6-11:** Selection of prescribed fire locations

**Comment:** Repeat prescribed fire where it has been done within the last 20-30 years. Burn in logged areas within eight years of harvest. (#25d)

**Discussion:** Standard practices include applying prescribed fire on previously burned lands where possible to maintain the beneficial fuel-reduction effects of the earlier fire. Burning after timber harvest is often beneficial but these areas may not always be the highest priority for limited prescribed fire resources.

**Topic 6-12:** Prescribed fire acreage

**Comment:** Reduce proposed prescribed fire acres to a more realistic figure. (#5)  
Include more prescribed fire. (#19)

**Discussion:** The proposed action includes the option of mechanical fuel treatment. Prescribed fire is proposed not only for its ecosystem effects but because it can be an economical means of reducing non-merchantable fuels. Based on historical averages and probable constraints, proposed prescribed fire acreage is near the limit of what can be accomplished.

**Topic 6-13:** Spruce

**Comment:** Do not cut spruce stands or spruce in pine stands. (#23)  
Thin spruce stands to reduce fire hazard. (#16)

**Discussion:** The proposal does not include timber harvest in spruce stands. Thinning spruce is generally inadvisable since it can result in windthrow (Shepperd and Battaglia 2002). Spruce is a lower fuels priority because most of the large stands are outside wildland-urban interface areas. Additionally, the Forest Plan does not set structural stage objectives for spruce. The proposal does include cutting of spruce and pine encroaching into meadows and hardwood stands for the purpose of maintaining and enhancing non-conifer vegetation communities.

**Topic 6-14:** MPB suppression

Comment: Use pheromones to address MPB. (#1a)

Discussion: Part of this project's purpose is to increase forest resilience to insect infestation and other disturbances. While the proposal would respond to MPB infestation that continues in some areas, the larger threats are hazardous fuels resulting from the epidemic and development of dense, contiguous pine stands that could be susceptible to a future epidemic or wildfire. The proposal includes actions to mitigate dead fuels and modify live stand conditions to begin the process of increasing resilience to these events. These actions do not involve or require use of pheromones.

**Topic 6-15:** Inventoried Roadless Area and Botanical Area

Comment: Include Sand Creek Inventoried Roadless Area and Dugout Gulch Botanical Area in "project calculations and treatment considerations." (#44)

Discussion: The project area boundary excludes Inventoried Roadless Areas and MA 3.1 (botanical areas). Cumulative effects analyses will consider these areas as appropriate.

**Topic 6-16:** Prescribed fire effects

Comment: Analysis should consider prescribed fire mortality limits and effects on other resources. (#13)

Provide additional information on proposed prescribed burning in stands with mixed MPB mortality and remaining timber potential/seed source. (#41)

Discussion: The DEIS will include this information.

**Topic 6-17:** New roads

Comment: Proposed new roads could add to the effects of existing roads by increasing road density and causing further human disturbance. (#25)

Discussion: Proposed new road mileage is a maximum. Analysis will determine whether the effects of these roads would be acceptable.

## Disposition 7. Topics Beyond the Scope of this Project

**Topic 7-1:** Post-sale project funding

Comment: "Only accept timber sale bids that provide enough KV funds to address post-sale concerns (weeds, thinning, etc.)." (#24)

Discussion: Timber sales are appraised and advertised at market value to spur competitive bidding, which provides funds for post-sale activities. Lumber market and field operating conditions, however, dictate stumpage rates or awarded sale value. In recent years, these conditions and resulting sale value have often reduced availability of Knutson-Vandenberg (K-V) funding.

**Topic 7-2:** Funding allocation

Comment: Allocate most of the funding to projects in WUI. (#26)

Discussion: Regional and other direction requires expenditure of at least 70 percent of appropriated fuel reduction funds on projects located in wildland-urban interface areas. Modifying funding allocation is beyond the scope of this project.

**Topic 7-3:** Firewood program

Comment: Relax restrictions on collecting firewood to reduce fuels. (#34)

Discussion: Personal-use firewood collection regulations are beyond the scope of this project. Regardless, most of the BHNF is open to collection of down wood, with cutting of standing dead trees allowed along many roads as shown on Motor Vehicle Use Maps.

**Topic 7-4:** Commercial timber vs. timber stand improvement funding

Comment: "I do not agree with pre-commercial activities detracting from the annual timber program budget." (#14a)

Discussion: Commercial timber harvest and precommercial thinning are separate programs. Funds for preparing and administering commercial timber sales are appropriated specifically for those purposes. Funds for precommercial thinning are appropriated for that purpose or collected from timber sale receipts for post-sale activities.

**Topic 7-5:** Mountain Pine Beetle Response project

Comment: Moving toward structural stage objectives must not be urgent since the Forest is still cutting dense stands under the Mountain Pine Beetle Response project. (#25a)

Discussion: The Mountain Pine Beetle Response project, approved in December 2012, is beyond the scope of this proposal.

Reference:

Shepperd, Wayne D., and Michael A. Battaglia. 2002. Ecology, silviculture, and management of Black Hills ponderosa pine. Gen. Tech. Rep. RMRS-GTR-97. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 112 p.