

Black Hills Resilient Landscapes Project - Comment Disposition

#	Commenting party	Comment	Disposition
1	Artley	Objects to project on grounds that MPB infestation doesn't increase likelihood of wildfires.	Clarification (6-1)
1a	Artley	Use pheromones to address MPB.	Clarification (6-14)
1b	Artley	Suggests felling and limbing small, sub-merchantable trees where needed.	Included in P&N or proposal (4-3)
2	BHFRA, Brenneisen, Form Letter, Wy Forestry	Focus on reducing MPB infestation risk (treat SS 4B and 4C stands).	Included in P&N or proposal (4-12)
3	BHFRA, Form Letter	Do not increase SS5 because it is susceptible to MPB and fire.	Included in P&N or proposal (4-4)
4	BHFRA, Form Letter, Brenneisen	Do not limit the number of acres of SS4A that can be cut.	Included in P&N or proposal (4-4)
5	BHFRA, Form Letter	Project relies too much on prescribed burning (proposes more per year than can be accomplished). Substitute mechanical thinning or commercial harvest in place of proposed prescribed fire activities.	Clarification (6-12)
6	BHFRA	Treat stands in the Jasper fire area.	Included in P&N or proposal (4-11)
7	BHFRA	Proposed commercial timber harvest could result in an inadequate supply of timber to support the existing local timber industry.	Clarification (6-2)
7a	BHFRA	It is unclear if designating additional areas of SS5 would require a forest plan amendment. It is presumed the acres of MA 3.7 is assigned specific acres under the forest plan.	Clarification (6-5)
7b	BHFRA	"Forest entomologists from SDSU and the Forest Service have recently reported as much as half of the BHNH is still at high risk for MPB infestation and mortality... Moreover, 54% of the treed area of the BHNH is identified as 'at-risk' for extensive basal area losses, or approximately 786,000 acres."	Clarification (6-6)
7c	BHFRA	"Comparing the possible treatment area of SS 4A stands (map 8), to the map depicting all SS across the Forest, it is evident many areas of 4A stands were excluded from possible treatment. However, there is no explanation of why these areas have been excluded. Examples, among others, can be found west of the HWY 14A/85 intersection and around Reynolds Prairie."	Clarification (6-7)
7d	BHFRA	For SS5, "only consider stands already at very low stocking rates to reduce future susceptibility to insect epidemics and high severity wildfires."	Already decided by law, regulation, forest plan, etc. (5-17)
7e	BHFRA	"Remove any areas currently designated as late succession in the applicable MAs that no longer meet management objectives."	Included in P&N or proposal (4-8)

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8	Brenneisen, NFAB	Regenerate more aspen (1,000 acres per year).	Clarification (6-3)
9	Brenneisen, NFAB	Remove pine from aspen on more acres.	Clarification (6-3)
10	Brenneisen, NFAB	Reduce MPB infestation risk by thinning denser SS4B stands without turning them into SS4A.	Modification (2-3)
10a	Brenneisen, NFAB	Any movement toward structural stage objectives should be a by-product of other management goals.	Included in P&N or proposal (4-4)
10b	Brenneisen, NFAB	"...dense stands of large diameter pine are highly susceptible to mbp 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."	Included in P&N or proposal (4-8)
11	Crozman, Jensen, Renner, Sadler	Logging could degrade scenery.	Analysis (1-1)
12	Crozman et al., Norbeck	Project could further increase weed infestation.	Analysis (1-2)
13	Form Letter (Batt, Brooks, Hall, Larsen, Lottes, Neiman)	Analysis should consider prescribed fire mortality limits and effects on other resources.	Clarification (6-16)
14	Form Letter	Make design features flexible and don't prohibit activities in a given area.	Already decided by law, regulation, forest plan, etc. (5-1)
14a	Form Letter	I do not agree with pre-commercial activities detracting from the annual timber program budget.	Beyond scope (7-4)
15	Forrester	The proposal "does not address the reconstruction of non-motorized trails both system, and those under special use permits in areas of timer harvest, and fuels treatment. Reconstruction of these travel routes is a connected action to the management prescription.Failure to include written direction, and funding within the plan places undue burden on small business, and not for profit volunteer groups to continue providing popular outdoor recreation opportunities that connect communities, provide economic stimulus to the region, and is supported by the National Trails Act, South Dakota omprehensive Outdoor Recreation Plan, and The Black Hills National Forest Land Management Plan."	Already decided by law, regulation, forest plan, etc. (5-14)
16	Forrester	Thin spruce stands to reduce fire hazard.	Clarification (6-13)

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17	Montague	Manage the forest according to unspecified tree relationships and principles in cited book.	Already decided by law, regulation, forest plan, etc. (5-2)
18	Norbeck	Address the future hazards posed by dense pine regeneration.	Included in P&N or proposal (4-3)
19	Norbeck	Include more prescribed fire.	Clarification (6-12)
20	Norbeck, NFAB, SDGFP	Retain the remaining large and old trees/individuals and cohorts of large-diameter pine.	Modification (2-2)
21	Norbeck	Designate more than 5% of pine for future SS5 (to allow for attrition).	Included in P&N or proposal (4-4)
22	Norbeck, NFAB	Improve and increase aspen, birch, and oak.	Clarification (6-3)
23	Norbeck	"Leave spruce stands untouched since there is uncertainty about the nature of their reaction to global climate change and likely there is a learning opportunity present for forest managers. Also, where spruce exist amongst pines, they offer diversity within those stands."	Clarification (6-13)
24	Norbeck	Only accept timber sale bids that provide enough KV funds to address post-sale concerns (weeds, thinning, etc.).	Beyond scope (7-1)
25	Norbeck, WyGF	Build no new roads. Constructing new, permanent roads will only increase the road density and corresponding human disturbance. ...minimize new temporary road construction.	Clarification (6-17)
25a	Norbeck	"We find little meaning in the urgency that the Forest Service expresses to bring SS into alignment with the Forest Land Resource Management Plan. While we take the FLRMP seriously, at present the Forest Service appears to be actively acting counter to those LRMP directives by cutting Structural Stage (SS) 5 stands as well as SS4B and SS4C stands via the Mountain Pine Beetle Response Project (MPBRP) and other projects."	Beyond scope (7-5)
25b	NFAB	"...promoting a healthy ecology through a mosaic of diverse vegetative conditions across the forest will improve the resilience of the forest."	Analysis (1-3)
25c	NFAB	"Increase use of uneven-aged management ('clumpy-groupy') in pine stands to increase diversity in the desired 'mosaic' of vegetation across the forest."	Included in P&N or proposal (4-10)
25d	NFAB	Repeat prescribed fire where it's been done in the last 20-30 years. Burn in logged areas within 8 years of harvest.	Clarification (6-11)
25e	NFAB	Where necessary, log in the winter to minimize ground disturbance (re weeds).	Analysis (1-2)
25f	NFAB	Include goals for minimum treatment acres.	Included in P&N or proposal (4-13)
25g	NFAB	Consider management plans that take into account resilience to drought and rising temperatures that may be caused by climate change.	Included in P&N or proposal (4-6)
25h	NFAB	Identify benchmarks of success and monitor achievement.	Included in P&N or proposal (4-7)

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25i	NFAB	"Seek collaboration with communities and individuals on project that aim to reduce fuel loading."	Already decided by law, regulation, forest plan, etc. (5-15)
26	Riley	Allocate most of the funding to projects in WUI.	Beyond scope (7-2)
27	SDForestry	Avoid creating landscapes of continuous moderate to high density pine.	Analysis (1-3)
28	SDForestry	Revisit SS objectives in next forest plan revision.	Already decided by law, regulation, forest plan, etc. (5-16)
29	SDForestry	"... we discourage management for moderate to high density pine stands in close juxtaposition to developed areas due to the potential for MPB and catastrophic fire."	Included in P&N or proposal (4-1)
30	SDGFP	Retain existing uneven spacing and variable density (higher basal areas on north- and east-facing slopes, lower BAs on south- and west-facing slopes).	Included in P&N or proposal (4-10)
31	SDGFP	Manage for uneven-age stands where these characteristics already exist (don't convert even-aged stands to uneven).	Included in P&N or proposal (4-10)
32	SDGFP, USFWS	Retain appropriate trees for cavity-dependent wildlife species.	Already decided by law, regulation, forest plan, etc. (5-8)
33	SDGFP	Design aspen regeneration treatments to prevent failure due to over-browsing/grazing.	Modification (2-1)
33a	SDGFP	In 4B and 4C stands, "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."	Included in P&N or proposal (4-9)
33b	SDGFP	"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"	Clarification (6-10)
33c	SDGFP	"...while clearfell-coppice harvesting of aspen is a proven method of encouraging new growth production from aspen root suckers in some areas, it is not a recommended treatment in the Black Hills as described by retired RMRS aspen ecologist Dr. Dale Bartos. If the new growth is not protected from browsing from wild ungulates and domestic livestock, new shoots will not persist over time, leading to the loss of the clone. Significant protection from all browsing is not possible or practical on the small isolated clones in the Black Hills, an area on the geographic fringe of aspen distribution."	Clarification (6-8)
34	Spencer	Relax restrictions on collecting firewood (to reduce fuels).	Beyond scope (7-3)
35	USFWS, SDGFP	Conserve northern long-eared bat habitat. Apply identified conservation measures [see comment letter] as appropriate.	Included in P&N or proposal (4-5)

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36	USFWS	Analysis should demonstrate how BHNH will ensure long-term viability of black-backed woodpecker.	Included in P&N or proposal (4-5)
37	USFWS	Protect other TES, species of concern, and migratory birds.	Included in P&N or proposal (4-5)
38	USFWS	Protect wetlands.	Already decided by law, regulation, forest plan, etc. (5-3)
39	WyAg	Do not include mandatory rest/deferment of livestock grazing.	Already decided by law, regulation, forest plan, etc. (5-4)
40	WyForestry	Include areas in Wyoming where Good Neighbor Authority could apply.	Included in P&N or proposal (4-2)
41	WyForestry	Provide additional information on proposed prescribed burning in stands with mixed MPB mortality and remaining timber potential/seed source.	Clarification (6-16)
42	WyGF	Include prescribed fire on Bearlodge district if not already planned.	Clarification (6-4)
43	WyGF	Avoid creating large, monotypic stands.	Analysis (1-3)
44	WyGF	"We suggest including the Sand Creek Inventoried Roadless Area and Dugout Gulch Botanical Area in project calculations and treatment considerations. The pine stands and other resources present in these areas should be included in any forest wide evaluation relative to the proposed project."	Clarification (6-15)
45	WyGF	"One question raised by field personnel during our Department's scoping review is the assertion that 4A stands are currently quite extensive constituting a large proportion of the forest. It is our perspective that the amount of more thinly stocked SS 4 stands is not as extensive - at least on the Bearlodge Ranger District. We recommend including clarifications on how stand determination was made and mapped."	Clarification (6-9)
46	WyGF	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.	Analysis (1-3)

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47	WyGF	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).	Already decided by law, regulation, forest plan, etc. (5-5)
48	WyGF	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.	Already decided by law, regulation, forest plan, etc. (5-6)
49	WyGF	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.	Already decided by law, regulation, forest plan, etc. (5-7)
50	WyGF	We recommend thinning projects should leave at least 1 or 2 large snags per acre, and a number of snags less than 6" dbh should be retained, as these provide foraging and cover sites for cavity nesting birds and other species.	Already decided by law, regulation, forest plan, etc. (5-8)
51	WyGF	In areas with wild turkeys, stand densities of 60-70 ft <sup>2</sup> /acre are appropriate where late spring to fall wild turkey use is present. 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.	Already decided by law, regulation, forest plan, etc. (5-9)
51a	WyGF	Turkey roost habitat typically requires stands with a basal area of at least 100 ft <sup>2</sup> /acre.	Already decided by law, regulation, forest plan, etc. (5-9)
52	WyGF	As planned, 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.	Already decided by law, regulation, forest plan, etc. (5-10)
53	WyGF	We recommend noxious weed control should occur where slash piles have been treated and where soils are disturbed by silvicultural activities.	Already decided by law, regulation, forest plan, etc. (5-11)
54	WyGF	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.	Already decided by law, regulation, forest plan, etc. (5-12)
55	WyGF	To minimize impacts to aquatic resources, we recommend use of guidance in Wyoming non-point source management plan, Wyoming forestry BMPs, Wyoming Fire Management Plan, and the Forest Service Healthy Forests and Rangeland Plan.	Already decided by law, regulation, forest plan, etc. (5-13)

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	BHFRA: Black Hills Forest Resource Association		
	Norbeck: Norbeck Society		
	SDForestry: South Dakota Division of Resource Conservation and Forestry		
	SDGFP: South Dakota Department of Game, Fish and Parks		
	WyAg: Wyoming Department of Agriculture		
	WyForestry: Wyoming State Forestry Division		
	WyGF: Wyoming Game and Fish Department		