



# Fire and Fuels

## Comments and Responses on Draft Assessment



Prescribed burn on the Long Draw Project in the Mystic Ranger District, 2018.

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## **Introduction: Assessment Response to Comments**

The Black Hills National Forest received a variety of public comments on draft assessments published in June 2022. Some commenters have expressed support for the draft assessments, while others have expressed concerns.

Those who express concern about the draft assessments often state that they believe the assessments do not go far enough in addressing the challenges facing the Black Hills; do not address the needs of local communities; or do not utilize the best available scientific information. Those that support the draft assessments often state that they are pleased with the level of detail and analysis that went into the assessments. They believe it will provide a good foundation for the need to revise the land management plan.

The Forest Service has reviewed all public comment received on the draft assessments and used this feedback to revise assessments where appropriate. The table below is a detailed summary of public comment received related to fire and fuels as well as the agency's response to each item. Many responses indicate where the revised assessment has been modified to better explain each item, or incorporate new information as provided by cooperators or the public.

Each comment and response table is provided not as a matter of regulatory compliance, but as an effort to demonstrate the Black Hills National Forest's commitment to transparency early in the plan revision process. Some comments below have been generalized or combined with similar comments to provide a more efficient response. No attempt has been made to retain a link between each comment and individual, organization, or entity that provided it.

## Response to Comments

| Comment  | Responses  |
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| <p>Reinvest in fuels treatments at a scale and scope that will strategically help reduce major wildfires. The Black Hills National Forest needs to continue to work closely with the states, counties, and other federal agencies to enhance capacity to respond to wildfires.</p>   | <p>The Assessment is meant to provide information on existing forest conditions and trends. During the plan development phase, goals and objectives for prescribed fire and mechanical fuels treatments will be shaped to current and desired forest conditions. The Forest will continue to collaborate with local and state partners, cooperators, and other Federal agencies during fire operations and response.</p> |
| <p>The thousands of top/slash piles across the Forest are a significant fire hazard. Many of these piles have been out there for years. There needs to be a concerted effort to burn these piles. Bring in additional resources when conditions are right to get them burned.</p>  | <p>Pile burning is a form of prescribed fire and environmental conditions must be met prior to any ignition. Each District tracks the number and location of piles on their respective portions of the Forest and every effort is made each season to accomplish this work. Management strategies will be considered during the planning and environmental analysis phase of the plan revision process.</p>              |
| <p>I liked what I read about your understanding of the rapid regeneration of the forest following the mountain pine bark beetle. It's literally a "growing" problem increasing fire risk in the Black Hills National Forest with every year that passes. I see it on Forest lands near our home. I note you've done a couple of prescribed burns to reduce fuel load from the thickets of "dog hair pine". Good. But there are many thousands of acres that need treatment like this, or manual cutting. You'll need funding to accomplish either one of them. Some foresight and action on that now will save money later as increasingly over time these stands become more fire-prone and harder to manage with fire or thinning.</p> | <p>It is estimated that approximately 250,000 acres need non-commercial thinning across the Forest; this backlog is acknowledged. Management strategies, goals, and objectives will be considered during the planning and environmental analysis phase of the plan revision process.</p>   |

*Black Hills National Forest  
Response to Comments—Fire and Fuels*

| <b>Comment</b>   | <b>Responses</b>   |
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| <p>Need for change: Adapt language surrounding descriptions of “fuel-loading” resulting from the recent beetle epidemic to reflect the fact that these fuels do degrade, eventually rot, and can be contributors to surface moisture, not to mention important habitat.</p>  | <p>We agree coarse woody debris has many benefits for the forest. However, the heavy accumulation of these fuels from the mountain pine beetle (MPB) epidemic is a concern for fire managers. Historically, MPB or fire mortality would not have resulted in the current surface accumulations because stand conditions were more open and frequent, low-intensity fire would have kept the buildup in check. With the current amount of large coarse woody debris, a fire could cause severe soil damage from long, surface fire residence times. Decay rates are certainly slower than fire return intervals on the Forest and the imminent threat to Forest resources from a high-intensity surface fire is what drives the need for further consideration during the plan development phase.</p> |
| <p>Crook County does not believe the Forest Service has satisfied the requirements in the Handbook (FSH) 1909.12 Chapter 10 section 11.2, which states, "Relevant local, regional, and national wildland fire management plans should be used in development of the assessment and to inform key sections. Such plans may include community wildfire protection plans and the National Cohesive Wildland Fire Management Strategy." The Fire and Fuels assessment only recognizes that all counties have plans but fails to utilize these plans in the assessment.</p> | <p>Community Wildfire Protection Plans are acknowledged within the Assessment. The Assessment Phase focuses on the evaluation of existing forest conditions and trends specific to management of National Forest System lands and resources. During the plan development phase, management strategies for fire and fuels treatments will be shaped to current and desired forest conditions.</p>   |
| <p>Crook County supports annual prescribed fires and mechanical treatments to manage fire and fuels in the Black Hills National Forest. The Forest Service is encouraged to continue to find ways to coordinate with the counties and the states on a regular basis. However, Crook County is concerned with the risks of prescribed fires to our communities. It should be noted in the assessment how the mosaic of private and Forest Service lands effect the ability to carry out prescribed fires.</p>   | <p>Thank you for your comment. There are inherent risks associated with prescribed fire with potential catastrophic outcomes as we saw in the spring of 2022, however, nationally, prescribed fire has a 99% success rate across all agencies and ignitions. There are rigorous protocols in place that must be followed prior to any prescribed fire ignition.</p>  |
| <p>It should also be noted the importance of commercial and non-commercial vegetation treatments in managing fire risks.</p>   | <p>The importance of commercial and non-commercial treatments is addressed in the final assessment.</p>  |

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| <b>Comment</b>   | <b>Responses</b>   |
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| <p>Crook County believes the assessment should describe the Forest Plan goals and objectives from the 1997 Revised Forest Plan and the Phase II amendment for prescribed fire and compare to actual achievement. The reasoning for this difference should be described (i.e., limited burn windows that meet prescription in order to meet burn objectives).</p>   | <p>The 2002 Phase II Amendment did not specifically identify Goals and Objectives for prescribed fire operations. Guideline 4105 “When feasible and appropriate use broadcast burning to dispose of slash in order to return the inorganic and organic chemicals in the foliage and small woody material to the soil, to reduce fire hazard, and to provide seed beds for natural regeneration. GUIDELINE”</p> <p>Forest Plans provide programmatic guidance and management direction rather than specific actions though those recommendations can be considered during the plan development phase.</p> |
| <p>Crook County would like to see more information presented regarding the benefits of a "faster moving fire due to increased grass and pine regeneration" compared to a "stand-replacing crown fire". These conditions should be linked to likelihood of fire severity outcomes (for example the Wabash Springs Fire).</p>  | <p>Thank you for the suggestion. Part of this paragraph was rewritten to provide clarity in the final assessment.</p>  |
| <p>Crook County is concerned that "The Need for Change" section seems to suggest that Standard 4103 and the Fire Management Direction Summary Table from the Phase II amendment need to change because they are "so limiting that all natural ignitions are suppressed to the smallest possible footprint". This is concerning because of the unique mosaic of public and private in the Black Hills National Forest and how wildfires put values at risk. As stated in the assessment, "all of the Black Hills National Forest could be considered wildland urban interface".</p> | <p>In the current fire management direction, "Wildland Fire Use" is allowed in several different management areas with very limiting suppression objectives making the concept of managing natural fire impractical. Recommendations on management strategies and potential impacts of managed natural fire will be considered during the planning and environmental analysis phases of the planning process.</p>  |

| <b>Comment</b>   | <b>Responses</b>   |
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| <p>The Crook County Natural Resource Management Plan (dated December 2, 2020, Photo Book 617, page 206) includes the following and the Forest Service should be as consistent with their management prescriptions as allowed by law:</p> <p>Priority #1 - Federal agencies shall coordinate with local fire agencies.</p> <p>Priority #3 - Federal agencies shall incorporate local fire association plans (Crook County Community Wildfire Protection Plan) into their fire suppression and control plans and support efforts of local fire departments in wildfire suppression activities.</p> <p>Priority #4 - Fire suppression efforts will be maximized through full coordination, communication, and cooperation between federal, state, and local fire suppression units.</p> <p>Priority #6 - Federal agencies should coordinate with State and local agencies to implement fire control tools such as insecticide and herbicide treatments, livestock grazing, biomass fuel removal, slash pile burning, prescribed burning, and encouraging knowledgeable and prepared practices to create defensible space around buildings.</p> <p>Priority #9 - Federal agencies should promote the prompt rehabilitation of harvested areas and areas affected by wildfire, including salvage logging operations.</p> <p>Priority #11 -- The County encourages federal agencies to promptly manage weed infestations in fire damaged areas.</p> <p>Priority #14 -- Post-fire objectives shall be consistent with site potential as defined in approved Desired Future Conditions or Ecological Site Descriptions. The County requires the use of credible data as previously defined to make these determinations.</p> | <p>The Assessment is meant to provide information on existing forest conditions and trends. During the plan development phase, management strategies, goals, and objectives for fire and fuels management will be evaluated by current and desired forest conditions and the Forest will consider recommendations during this phase. The Forest will continue to collaborate and coordinate with local and state partners, cooperators, and other agencies during all facets of local fire operations.</p> |

| <b>Comment</b>   | <b>Responses</b>   |
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| <p>(Continued from previous page)</p> <p>Priority #15 - Federal agencies should rehabilitate forests and rangelands damaged by wildfires as soon as possible for habitat, wildlife, and to reduce the potential for erosion and introduction of invasive or noxious weeds.</p> <p>Priority #16 - Federal agencies should allow for adaptive grazing management practices and include these practices in term permits to allow for flexible management practices that will decrease fine fuel loads on the landscape, particularly in areas with heavy grass understory.</p>  | <p>(Continued from previous page)</p>  |
| <p>Rocky Mountain Elk Foundation (RMEF) is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent catastrophic wildfires and assists in long-term ecosystem resilience (Prichard et al. 2020, Schultz and Moseley 2019). In addition, managing natural ignitions can help achieve fuels and vegetation goals. RMEF recommends forest product harvest levels that maximize opportunities to achieve fuels reduction, vegetation management, and wildlife habitat goals.</p> <p>RMEF recommends inclusion of the recent Bipartisan Infrastructure and Jobs Act and subsequent USFS Wildfire Crisis Strategy (2022) be incorporated in this and future project planning.</p> | <p>Thank you for your support. Plan components will be considered during the plan development phase of the planning process.</p>                             |
| <p>Maps of condition classes for the Forest, fire and prescribed fire histories, and fuel treatment areas would be helpful to grasp the current assessment of the fuels for the Forest.</p> <p>Provide human vs natural ignitions data to show trends.</p>   | <p>Data has been added to the Final Assessment. Other issues can be addressed during the plan development process and associated environmental analysis.</p> |



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| <b>Comment</b>   | <b>Responses</b>  |
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| <p>Provide top piles created vs top piles burned data to show whether the burning of all top piles is feasible given the climate of the Black Hills.</p>   | <p>Estimations from District personnel put pile burning success rate at greater than 95% over a 10-year period. A small percentage of top-wood and hand-piles do remain on the Forest for several years awaiting favorable conditions for burning. There currently is a developing market for wood chips that has been beneficial in reducing the number of piles on any given project.</p> |
| <p>Thinning and fuels reduction near wildland urban interface areas has been beneficial in aiding fire suppression activities although it should be focused on additional considerations. The Wabash Springs fire west of Custer this spring is a very good example of proactive fuels mitigation. However, if the fuels reduction does not include a maintenance program, to include prescribed fire or pre-commercial thinning post fuels reduction the benefits will be lost within 10 years or less.</p> | <p>Management strategies for fire and fuels management will be evaluated through current and desired forest conditions during the plan development phase.</p>   |
| <p>Broadcast Pile burning misrepresents acres burned through the reporting process for benefit of the Forest by making acres burned numbers look better. Burning a 100' by 100' pile and reporting it as 300 acres treated is misleading. The timber sale or thinning project is what removed the fuels. Burning piles only eliminates the byproducts of the thinning.</p>   | <p>The Forest follows all appropriate agency business rules for reporting accomplishments.</p>  |
| <p>According to the Fire and Fuels Assessment (pg. 6), temperatures will increase with a predicted tripling of days with high temperatures above 95 degrees, there will be a slight increase in annual moisture, precipitation patterns will be more variable, and the number of fires, acres burned, and burn intensity will all increase. There are no citations for any of that.</p>  | <p>The reference has been added to the Final Assessment.</p>  |
| <p>We recommend adding the following to the Need for Change: “Significantly reduce the potential for future stand-replacing fires.</p>   | <p>Management strategies, goals, and objectives will be evaluated during the plan development phase.</p>  |

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| <b>Comment</b>   | <b>Responses</b>  |
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| <p>The discussion about fire intensities in the 2nd and 3rd paragraphs on page 2 is muddled. There is a sentence (citing 2 Brown publications) stating that “fire intensities were low ... to mixed severity”, a sentence (citing Shepperd and Battaglia) stating that “larger and higher intensity fires would have occurred”, and another sentence stating that “The Black Hills are a prime example of a mixed severity fire regime”. It’s important to clean up that discussion (in this Assessment and other Assessments) for consistency.</p>        | <p>Thank you for your comment. The assessment has been revised to better explain past fire intensities and regimes.</p>             |
| <p>The 1st paragraph on page 4 needs some editing –to discuss a) the relative difficulty of suppressing a “stand-replacing crown fire” versus a “faster moving fire due to increased grass and pine regeneration” and b) the likely effects of a “stand-replacing crown fire” versus a “faster moving fire due to increased grass and pine regeneration (the Wabash Springs fire might be a good example).</p>   | <p>Addressed in the final Assessment.</p>   |
| <p>The Assessment needs a fuller discussion about the potential role of prescribed burning, especially the reasons that “broadcast prescribed fire is not implemented at a pace nor scale to have a meaningful effect on the overall fuels condition present on the national forest” (page 4) and the following conclusion from Shepperd and Battaglia – “Prescribed fire should therefore not be considered a panacea in the management of ponderosa pine, but only one of many tools that can be used to manage pine ecosystems in the Black Hills”.</p> | <p>Management strategies, including future potential roles of prescribed fire, will be addressed in the plan development phase.</p> |

| <b>Comment</b>   | <b>Responses</b>  |
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| <p>The assessment should also include and discuss the following from Fitzgerald, S.A., 2005. <i>Fire Ecology of Ponderosa Pine and the Rebuilding of Fire-Resilient Ponderosa Pine Ecosystems</i>. USDA Forest Service, PSW-GTR-198 – “However, in most ponderosa pine stands prescribed burning is limited as a first-entry fuels treatment because of heavy accumulations of surface and ladder fuels. In most cases, other mechanical treatments are needed prior to prescribe burning in order to reduce fuels to a level that prescribed burning can be used in subsequent treatments without undue damage to the residual stand.”</p>  | <p>This reference will be used in the plan development phase.</p>   |
| <p>Forest Plan Objective 223 (1997 Revised Plan) called for 8,000 acres of management ignited fires and prescribed natural fire per year for the ‘next decade’. That Objective was deleted as part of the Phase II Amendment. The actual annual accomplishment of prescribed broadcast burning from 2009-2018 was only 1,360 acres.</p>  | <p>Management strategies, goals, and objectives, including future potential roles of prescribed fire, will be considered in the plan development phase.</p> |
| <p>Forest Plan Objective 210 (1997 Revised Plan) was “Implement at least one adaptive management project (fire simulation cut) in the next 10 years to simulate forest structural conditions following a stand-replacing fire (using primarily mechanical methods). Follow this treatment with low-intensity prescribed fire when ground fuels permit.” In retrospect, that Objective seems foolish, but it’s worth mentioning to illustrate that the period during which the 1997 forest plan revision was underway, there were no significant fires; consequently, the forest plan was developed without a good appreciation of the risks and potential effects of fires on the Black Hills National Forest.</p> | <p>Management strategies, goals, and objectives, including the use of adaptive management, will be considered in the plan development phase.</p>            |

| <b>Comment</b>  | <b>Responses</b>  |
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| <p>Habitat loss is the largest threat to wildlife. One wildfire could cause entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife and habitat. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect this wildlife and prevent extinction is to actively manage forests to prevent wildfires. In order to adequately manage the forest, roads are a critical component. Roads not only provide access to carry out forest management projects but also act as a natural fire barrier. Wilderness and areas with restrictive management without many anthropogenic disturbances are not conducive to wildfire prevention and habitat and species vitality. Wilderness already makes up a large portion of the area. BlueRibbon Coalition (BRC) strongly encourages any plan revisions to strongly consider removing any wilderness characteristic areas as well as roadless areas and pursue forest fire mitigation projects that will ultimately help protect the species.</p> | <p>Active management has occurred on approximately 750,000 acres across the Black Hills since 1997. These treatments have primarily reduced stand densities with the potential to reduce potential fire intensities. Fire will never be eliminated from the Forest; however, management actively works towards reducing severe fire effects when fires do occur. Recommendations on plan components will be considered during the plan development phase.</p> |
| <p>Thinning and fuels reduction near interface areas has been beneficial in aiding fire suppression activities although I believe that it should be focused on more than it is currently. The Wabash Springs west of Custer this spring is a very good example of proactive fuels mitigation. However, if the fuels reduction does not include a maintenance program, to include prescribed fire or pre-commercial thinning post fuels reduction, the benefits will be lost within 10 years or less.</p>  | <p>Management strategies for fire and fuels management will be evaluated through current and desired forest conditions during the plan development phase.</p>   |

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| <b>Comment</b>   | <b>Responses</b>  |
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| <p>A more aggressive prescribed fire program needs to be established, and the program should seek to perform cooperative burns with State, Federal, and private partners. The Section 2 Rx in 2015 was a cooperative burn with The US Forest Service, National Park Service, State of South Dakota, and a private landowner. In 2016 when the Cold Fire occurred just west of the prescribed fire area the private landowner said that participating in the prescribed fire reduced impacts of the fire to his property and potentially saved some of his buildings.</p> | <p>The Forest Service is proud to collaborate with local and state partners, cooperators, private landowners, and other agencies during all facets of local fire operations including prescribed fire. Projects are currently in the planning stages that incorporate multiple jurisdictions that will require the cooperation of State, Federal, and private partners.</p> |
| <p>Include activities like timber harvest and livestock grazing as a management tool to help reduce largescale wildfire.</p>   | <p>Both activities are recognized by the Forest as tools for fuels treatment. Management strategies and plan components will be considered further in the plan development phase.</p>   |