Dear Planning Participant,

Public comments are requested for the **Exemption Area Wildland-Urban Interface Project**. The South Dakota Field Office, Bureau of Land Management is proposing a hazardous fuels/forest thinning treatment in the Exemption Area containing the cities of Lead, Central City, and Deadwood, in Lawrence County, South Dakota.

The Exemption Area (***See Map #1***) contains the "communities at risk" of Lead, Deadwood and Central City as well as Pluma, Englewood, and other areas of wildland urban interface (WUI). The entire Exemption Area is approximately 22,520 acres of intermingled private lands (17,242 acres) and Bureau of Land Management lands (5,278 acres). The Exemption Area was exempted from the Black Hills National Forest due to the complex mineral survey and public land configuration. Federal lands within the Exemption Area are now administered by the Bureau of Land Management (BLM).

Purpose and Need for the Project

The forests surrounding these urban areas are mostly ponderosa pine with scattered aspen, paper birch, and white spruce. At present most of this forest is a densely stocked, multi-storied stand of ponderosa pine. Surface fuels in these forest stands have been allowed to accumulate due to fire exclusion and lack of active management, which has created a dangerous susceptibility to catastrophic crown fire. These communities were impacted by destructive wildfires in the late 1800's, the early 1900's, the 1959 Deadwood Fire, and the recent 2002 Grizzly Gulch Fire. The experience of last summer's Grizzly Gulch Fire, which burned approximately 11,000 acres around the outskirts of Lead and Deadwood, demonstrate the potential for a wildfire to quickly grow into a large crown fire event that poses a very real threat to the communities in the Exemption Area. The National Fire Plan directs agencies to identify those communities that are at high hazard for wildfire and develop management actions to reduce that hazard. The Exemption Area was identified by the BLM as one of the high-hazard areas that needed fuel reduction treatments.

Analysis Process

A local team of private, city, county, state and federal partners have identified wildland/urban interface zones (WUI) requiring treatments in order to reduce the fire hazard to the communities in the Exemption Area. Fuel hazard assessments by US Forest Service, BLM and local officials have rated this area in the High Risk, Hazard and Value categories. The Bureau of Land Management has engaged an interagency planning team to develop proposals that will include fuel modification projects that, if completed, will help to reduce the fire hazard to these communities by effectively reducing the potential for a crown fire within identified zones *(see discussion on the WUI treatment areas below)* and providing defensible, survivable space. The interagency planning team has ranked forest stands into high, moderate or low hazard based on vegetative and fuel criteria (**See Map #3**). Approximately 65% of forested stands in the treatment areas are ranked as either high or moderate hazard.

The proposed treatments would result in fuel modification projects that would reduce the fire hazard to these communities by effectively reducing the potential for a crown fire within forested areas ½ to 1 mile distant, and providing defensible and survivable space. A ½ to 1-mile distance from structures is selected for the WUI treatment areas for the following reasons: 1.) Firebrands from an approaching crown fire in the Black Hills typically can be carried ½ mile or more before falling to the surface and igniting spot fires, 2.) This is an area most at risk from human-caused fires, and 3.) This space would give suppression forces a reasonable chance to safely contain fire spread before its encroachment on structures. These areas (within ½ to 1-mile of homes and structures) are referred to as the Wildland-Urban Interface (WUI). The definition of the Wildland-Urban Interface is: "the zone where structure and human development meet or intermingle with wildland vegetation and fuels."

In addition, a network of "fire containment zones" are proposed. These zones create corridors in which the fire hazard is reduced to allow firefighters relatively safe access for wildfire suppression activities. These fire containment zones (FCZ's) are situated along existing roads or topographic features and are along strategic fire defensible locations both within and outside the Exemption Area boundary.

Eleven WUI Treatment Areas (**See Map #2**) are delineated in the Exemption Area and include:

WUI Treatment Area	Total Acres	Pvt. Acres	BLM Acres
1. Blacktail Gulch	407	374	33
2. Central City	449	449	0
3. Deadwood North	424	398	26
4. Deadwood South	1072	591	481
5. Deer Mountain	916	830	86
6. Englewood	1528	762	766
7. Grizzly Gulch	394	190	204
8. Kirk	502	502	0
9. Hearst[1]	*639*	*514*	*125*
10. Nevada Gulch	1841	1051	790
11. Peedee Gulch	514	383	131
Totals	**8,686**	**6044**	**2,642**

[1] The Hearst WUI Treatment Area was an initial pilot project and is currently being treated to reduce hazardous fuels. An environmental assessment was completed in 2001. Treatments in the Hearst WUI are not part of this specific proposed action; however, treatments are designed to reduce hazardous fuels in an effective manner across the Exemption Area.

Relationship of Private Lands to the Exemption Area Fuels Reduction Strategy

The Exemption Area Wildland-Urban Interface Project proposes to implement specific treatments only on BLM managed lands. However, as a more effective fuel hazard reduction strategy for the Exemption Area on a larger scale, substantial fuel reduction treatments are also needed on private lands adjacent to BLM managed lands proposed for treatments. To facilitate this, fuel hazard rating estimates for adjacent private lands would be available to the South Dakota Division of Conservation & Forestry, and to private landowners. Specific treatment recommendations implemented on BLM lands would be available for use as guidance to develop similar fuel reduction treatments on private lands within the Exemption Area. The majority of the lands within the Exemption Area and within the WUI Treatment Areas are under private ownership. In addition, the majority of areas that would be treated to create a network of fire containment zones are also under private ownership. Therefore, the most effective overall fuels reduction strategy for the Exemption Area requires the involvement of many different landowners and the assistance of the South Dakota Division of Conservation & Forestry to implement similar fuel treatments in the next decade.

Proposed Action

The proposed action would treat approximately **2,380-2,535** acres of the lands in the Exemption Area managed by the Bureau of Land Management (**See Maps #4 & #5**). If this proposal were adopted, these treatments would start in summer 2003 and continue until projects are complete. Management objectives are to reduce wildland fuels in stands rated as high or moderate hazard by thinning various diameter trees. Commercial thinning would use ground-based tractor yarding. No new specified road construction would be needed, although some existing roads would need maintenance or reconstruction. Forested stands would be treated using a combination of

- Fuel Treatments using commercial and noncommercial thinning (**1,500 acres**)
- Fuel Treatments using noncommercial thinning (**110 acres**)
- Post-fire (Grizzly Gulch Fire) fuel treatments (**445 acres**)
- Fire Containment Zone (FCZ) fuel treatments using commercial and noncommercial thinning (**4.0** miles)
- Fuel Treatments using prescribed fire on low hazard stands (**325 acres**)

Fuel Treatments using Commercial and Noncommercial Thinning

Treatments in dense stands identified as having a commercial size green tree component, would be thinned initially with commercial harvest methods (**1,500** acres). Subsequent noncommercial treatments would be used to reduce hazardous fuels in the smaller noncommercial tree size. Commercial harvest (trees ≥ 8" in diameter) would involve thinning from below, meaning that the largest trees would remain and smaller commercial size trees would be removed until the desired objectives of stand canopy spacing and canopy closure is achieved. The dominant overstory in the commercial stands range from 10"-16" diameter and the post-treatment stand would generally have trees in the 12"-16" size remaining. All management activities, including the sale of commercial timber, post-pole products, biomass products, and the cutting, piling, burning, or crushing burning of non-merchantable material would be used to treat these stands. Specifically, treatments would result in the following:

- Retain larger diameter ponderosa pine trees.
- <40% canopy closure.
- 10-15' spacing between tree crowns.
- 20-25' spacing between tree boles
- Leave 1-5 clumps (3 to 5 trees) of dominant overstory trees per acre where they exist. This provides structural and visual diversity and avoids a "tree-farm" spacing look. Pine stands tend to naturally form "clumps" of 3-5 larger trees on the landscape.
- Leave untreated, stands of spruce/pine where spruce is the dominant overstory tree, (up to 5 acres).
- In hardwood stands (areas where birch and aspen are the dominant species) that are approximately 1-acre and larger, remove all conifers (ponderosa pine and white spruce) within the hardwood stand, and all conifers within 66 feet of hardwood stand.

Fuel Treatments using Noncommercial Thinning

These stands (**110** acres) are overly dense with green trees in the <8" diameter sizes. The same treatment objectives as above are recommended, however these stands have no identifiable commercial size tree component to be removed as part of the fuel reduction treatment. Only noncommercial treatments activities would be used.

Post-Fire Fuel Treatments

These treatments (**445** acres) on fire-killed trees would occur in the WUI's affected by the 2002 Grizzly Gulch Fire, specifically the slopes above Deadwood in the Deadwood South WUI, and in the adjacent Kirk, Pedee Gulch, and Grizzly Gulch WUI's. Post-fire salvage of the larger commercial trees is ongoing (*Grizzly Gulch Fire-Hazard Tree & Salvage EA, July 29, 2002*); however, many areas still have dense standing dead tree patches that will begin to fall down within 1-2 decades and create a long-term fuel loading hazard. These stands would be treated in the next 5 years to reduce the long-term impacts of a high fuel loading at the ground surface from these dead standing trees. All management tools, including cutting, piling, chipping, and burning of dead trees would be used to treat stands.

Fire Containment Zone (FCZ) Fuel Treatments using Commercial and Noncommercial thinning

A network of Fire Containment Zones (FCZ) (**4.0** miles on BLM lands) are also proposed to provide safe corridors for fire suppression crews to utilize aggressive suppression techniques on approaching wildfires. The FCZ's are fuel treatments (**66-330** feet wide) usually along an existing road, trail, or topographic feature (ridgeline) that would provide safe access for fire crews to initiate suppression action. A network of interconnected FCZ's was developed for the entire Exemption Area, regardless of ownership or status totaling **24.0** miles. Approximately **15.0** miles are within the Exemption Area boundary, of which **4.0** miles are on land managed by the Bureau of Land Management (**See Map #5**). The fuel treatments within the FCZ's would be more aggressive than the treatments recommended for other forest stands. Distance between remaining tree crowns and tree boles would be increased. Treatments would be "feathered" from the center of the FCZ (road edge or ridgeline) to the adjacent treated stands. The intent of feathering is to limit the visual impacts (straight-line effect) between different fuel treatments. Landscape appearance within the FCZ would resemble an open, park-like stand with a very light surface fuel loading. Specifically, treatments in the FCZ's would result in the following:

- Favor larger diameter ponderosa pine trees.
- <40% canopy closure.
- 15-25' spacing between crowns.
- 30-45' spacing between boles

Fuel Treatments using Prescribed Fire

These treatments (**325** acres) would occur in stands identified as low hazard rating and would be used to maintain the existing low hazard condition. In addition, prescribed fire would be used as a long-term maintenance treatment (every 7-10 years), for all stands treated by commercial and noncommercial methods noted above. Prescribed fire would be used to reduce small fuels such as branches, needle litter and dense pine regeneration. Hardwood stands would be treated with prescribed fire to remove encroaching pine seedlings. Areas selected in each stand for prescribed fire treatment would be dependent on specific local conditions and would only occur under an approved burn plan by a designated fuels specialist. Acres would be treated in early spring or late fall, and would be in acre size blocks (determined by site conditions) that would allow the safe use of prescribed fire. Smoke management procedures would be implemented to protect the air quality of the surrounding communities.

Your comments are requested

The environmental analysis for this area has been ongoing prior to the 2002 Grizzly Gulch Fire. Your comments or concerns relative to this proposed action are requested to help with our analysis and final project development. Your comments should be as detailed as possible and note any specific concerns you may have with the effects of proposed management activities, issues not considered, suggestions for other alternatives, or any measures to improve the project design. Your comments are requested by **February 10, 2003** to be most useful at this proposed action stage of the environmental analysis and public involvement. Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action, and would be available for public inspection. An open house meeting is planned for early February 2003, and will provide another opportunity for the public to offer comments on the proposal. The time and place for the open house meeting will be announced in the local newspaper. The environmental analysis should be completed and a decision made by late March 2003. To submit written comments you may use the attached comment form if desired. To obtain additional information about this project contact:

Terry Chaplin
Project Leader
Exemption Area Wildland-Urban Interface Project
Bureau of Land Management
South Dakota Field Office
310 Roundup Street
Belle Fourche, SD. 57717-1689.

Color versions of the project maps are posted on the BLM website at: http://www.mt.blm.gov/sdfo/index.html
Additionally, you can contact this office at email: **tchaplin@blm.gov** or by phone at (605)-892-7000, or (605) 720-0745

Sincerely,

Marian Atkins
South Dakota Field Office Manager
Bureau of Land Management