



**Norbeck Society  
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February 1, 2024

Director, Ecosystem Management Coordination  
201 14th Street SW  
Mailstop 1108  
Washington, DC 20250-1124  
Submitted via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

**Re: Land Management Plan Direction for Old Growth Conditions across the National Forest System #65356.**

Dear Director,

Since 2005, volunteers of the Norbeck Society have advocated for sustainable use of public lands, and we believe it is imperative to attain the highest and best uses of the multi-use National Forest System lands.

Government has an important role: *it can and must do things that individuals and smaller groups cannot*. Finding solutions to the steep challenges we face due to human caused climate change are most certainly worthy of U.S. government agency efforts. One of the most important solutions are nature-based, and we support the efforts you have made to define and analyze threats to old growth. **We fully support the proposed National Forest Plan Amendment to Conserve and Steward Old Growth Forests** and the necessity of implementing it as soon as possible for these interrelated reasons:

- 1. The climate change emergency.**
- 2. The need to preserve and enhance biodiversity and biocomplexity.**
- 3. The necessity of human connection with nature.**
- 4. The need to counter forces that threaten regulatory agency purview.**
- 5. The need for meaningful labor.**

**The climate change emergency.**

We must now race to mitigate a rapidly warming climate by storing, not releasing carbon. Even in fire-evolved ecosystems, mature and old growth forests can continue to provide carbon storage. In fact, well-maintained mature and old forests are far more able to survive wildfire and continue to store carbon than the “timber plantations” into which the timber industry wishes to bend our National Forests. Our mature and old growth canopies provide an irreplaceable wealth

of services including storing carbon and modulation of local temperature fluctuations in the plants and soils beneath them.

### **The need to preserve and enhance biodiversity and biocomplexity.**

Mature and old growth forests are wells of biodiversity on which healthy ecosystems are reliant.

### **The necessity of human connection with nature.**

People have a great need to interact with intact mature and old growth natural ecosystems in order to fully appreciate our utter dependence on the biocomplexity of the natural world that supports our lives. It is this interaction that will motivate us to know and support the value of changing the disastrous climate course we are taking. It is the health, permanence and, indeed, the beauty of nature, that provide us with the necessities for our lives.

### **The need to counter forces that threaten regulatory agency purview.**

When the timber industry lobby and politicians beholden to them bend policy to serve their purposes, actions on the ground can be destructive to the benefits that our forests can and should provide. This is a relatively new and growing threat that has an appropriate place in this amendment. Unfortunately, the timber industry has become a threat to the survival of the U.S. Forest Service as a regulatory agency. Just as big tobacco endangered the health of countless individuals, the timber industry has the capacity to nullify the ability of our National Forest System to contribute to climate change mitigation. A nation-wide forest plan amendment will help to strengthen the ability of the agency to resist these influences. Forest Service can expect a lot of comments against the proposed amendment because it weakens the influence of those who seek self-enrichment at the expense of the greater good. **We fully support not having a provision for Objections.** It's important to remember that the American public is the U.S. Forest Service's most important stakeholder, not timber companies and their lobbyists.



While pointing fingers at insects and wildfire, the timber lobby has destroyed more mature and old growth on the Black Hills National Forest than other factors combined. Despite never meeting the Forest Plan objective for 5% old growth for 20 years, Black Hills National Forest continues to sell old growth and mature. Unfortunately, the logging of mature and old-growth trees that provide free and fire-resistant carbon storage is ongoing across the Black Hills National Forest:



The Amendment to Conserve and Steward Old Growth Forests will underline and reinforce measures in individual forest plans.

### **The need for meaningful labor.**

Forest workers deserve meaningful work. Meaningful work does not destroy our forests, the botany, wildlife, and the human connections to nature. Meaningful work is a well of dignity, purpose, and social contribution for the worker.

Forest workers, whether they are federal employees or private contractors, must not be employed in the business of destroying forest capabilities to mitigate climate change. There is much meaningful work to do in the way of small tree thinning and prescribed burning to ensure that our old and mature trees can survive and continue to be cornerstone contributors to carbon sequestration and storage while also protecting and enhancing the biodiversity and biocomplexity of our forests.

### **Conclusion**

E.F. Schumacher, is an internationally influential thinker, economist, and statistician. His book Small is Beautiful – Economics as if People Mattered has a chapter called “Proper Use of the Land” and it starts with this statement: “Among material resources, the greatest, unquestionably, is the land. Study how a society uses its land, and you can come to pretty reliable conclusions as to what its future will be.”

In less than 300 years, we have proven that we can destroy what took more than a billion years to produce – the climatic and environmental circumstances that provide for our lives. We can no longer view our National Forests with ecological stupidity and gross simplicities of quantification, and we can no longer afford to overlook or distort the overwhelming need to care for the qualities that *only* our National Forests can provide. The need to implement the solutions to human caused climate change cannot be understated. In fact, our future depends on it.

The Black Hills National Forest could be the poster child for the need for national direction. The Black Hills National Forest Land Management Plan has an Old Growth Objective derived from a court-ordered settlement. Despite this being in place since 2004, old growth has never been above one percent; yet the forest has consistently been the top producer of sawlogs on the National Forest System. Current Forest Plans and their direction for old growth have not worked.

The Amendment to Conserve and Steward Old Growth Forests is a necessary re-prioritization of forest resources with the intent to foster the long-term resilience of old growth forest conditions and their contributions to nature-based solutions for carbon storage and ecological integrity across the National Forest System. The Amendment will provide consistent direction to conserve and steward existing and future old-growth forest conditions across the National Forest System and will back up its intent with monitoring.

Thank you for the opportunity to provide input on this critical topic.

Sincerely,

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