



**DEPARTMENT of AGRICULTURE  
and NATURAL RESOURCES**

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Director, Ecosystem Management Coordination  
201 14<sup>th</sup> Street SW,  
Mailstop 1108  
Washington, DC 20250-1124

Dear Director,

Thank you for the opportunity to comment on the notice of intent to prepare an environmental impact statement proposing to amend 128 land management plans' direction for old-growth conditions across the National Forest System.

South Dakota is home to the Black Hills National Forest, Custer-Gallatin National Forest, and the Nebraska National Forest, and these forests are a vital part of the state's ecosystem and environment. Approximately 86% of South Dakota's coniferous forests are in the Black Hills, and those forests contribute to the creation of 2,770 jobs and \$116.4 million on an average annual basis; 1,169 jobs and \$49,600,000 comes from the timber program alone<sup>1</sup>. The forested environment in South Dakota has provided for a robust timber management program as well as outdoor recreation opportunities including hunting, hiking, camping, and others. Maintaining the access to those lands, for all uses, is of critical importance to South Dakota.

We feel the proposed changes are unnecessary, and therefore should be withdrawn. The intent of the proposal is to facilitate the development of geographically informed adaptive strategies for old-growth forest conservation which is and has already occurred as Forests revise and rewrite their management plans. The 2012 Planning Rule already has the necessary directives which produce land management plans where old growth is identified, managed (and/or protected), planned for, and valued. The 2012 Planning Rule is based on locally developed and locally driven forest planning, with significant input and participation from all stakeholders. The proposed changes eliminate the ability for local planning and local public participation in the development of old growth management.

The Black Hills National Forest (BHNF) has begun the forest plan revision process and the assessment phase has already taken more than one year to complete. Based on the proposed timeline shared during the December 2023 announcement to stakeholders, you expect to publish the final EIS in January of 2025. This could potentially extend the BHNF plan revision by several months, if not years. This is an unnecessary burden on time and money to the stakeholders involved.

The Custer-Gallatin Land Management Plan was revised under the 2012 Planning Rule and finalized and adopted in 2022. This plan includes Forest wide desired and existing conditions of old growth, guidelines addressing old-growth management, protections of old growth within their Research Natural Areas, and a monitoring plan to assess old-growth forests. This plan was developed under a locally lead process, incorporating local knowledge and values to manage the resources to best fit the ecological and social needs of the forest.

Additionally, the report “Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management” highlighted the widespread nature of old growth and mature forests with over 32 million acres of old-growth and nearly 16 million acres of which resides in Wilderness, Inventoried Roadless Areas, and National Monuments<sup>2</sup>. Nearly half of old growth, on Bureau of Land Management and USDA Forest Service lands, already received some level of protection to aid in the resiliency and presence of old growth on the landscape.

It is stated “The need for change is to create a consistent set of national plan components and direction for the development of geographically informed adaptive implementation strategies for the long-term persistence, distribution, and recruitment of old-growth forest conditions across the National Forest System...” We would argue there is no need for change; the 2012 Planning Rule already outlines and guides the creation of a consistent set of national plan components and direction.

We feel the proposed changes are too costly. The requirement to revise 128 forest plans, will be extremely and unnecessarily costly, as this is already occurring without the need for these amendments. Some forest plans were completed just two years ago, and most already have old-growth components, goals, objectives, desired conditions, and adaptive management plans. The proposed changes won't just result in the addition of protections to old growth; it will have a cascading effect (very possibly negative) on all other areas of a forest plan. Putting protections in one area could lead to the need to change and revise how forests manage other areas – leading to a major plan revision/rewrite; and in some cases, having a significant impact on the suitable base, allowable sale quantities, and total sale program quantities. This will take time away from other projects, and time to implement a redundant process already occurring under current plan revision rules.

Disturbance driven ecosystems often have varying stand ages and composition that changes and ‘moves’ along the landscape. Identifying locations and areas to attempt to

maintain old growth stands present on a particular patch of ground is not sustainable or desirable. Some areas have old growth due to a lack of natural processes (such as fire suppression activities) and requiring a 'one-size fits all' approach to old growth management could lead to the protection of an unnatural system and the continuation of unnatural conditions.

In November 2023 the Preliminary Results of the Threat Analysis was presented to partners. The results of that analysis showed climate change, wildfire, insects, and disease as the primary threats to old growth. Timber harvest (tree cutting) accounted for a very small percentage of loss (~10,000 acres in the last two decades). The protections highlighted in the proposed Standard for Management Actions within Old-Growth Forest Conditions 1, and 2(a) does not address the real threat to old-growth stands, and in some forests, may exacerbate the current and real threats to old-growth.

In closing, we do not support the proposed nationwide plan amendment, and would like it withdrawn. The amendments are not necessary, and if implemented could result in deleterious impacts to South Dakota's forests. Local BBNF, CGNF, and NBNF offices work effectively with local partners to ensure their land management plans and activities contain useful and durable mechanisms and frameworks for the continued presence and conservation of mature and old-growth forests.

Thank you for the opportunity to comment.

Sincerely,



Marcus Warnke  
State Forester

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<sup>1</sup>U.S. Department of Agriculture (USDA), Forest Service, Black Hills National Forest. 2023. Forest Assessments: Socioeconomics. Accessed January 15, 2024.

[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1153855.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1153855.pdf)

<sup>2</sup>U.S. Department of Agriculture (USDA) Forest Service. 2023. Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management. FS-1215a. Accessed July 19, 2023. <https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf>