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<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

**RE: Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System (DEIS)**

Thank you for the opportunity to comment on the DEIS and other documents available on the project web page. This is the third letter we are sending in, as we signed on to two letters organized by the John Muir Project. We are dissatisfied with the DEIS, as we explained in the John Muir Project organized letters. Much of the territory our members live in is within or near the Black Hills of SD, so we are especially concerned with issues associated with the Black Hills National Forest (BHNF).

**VERY LITTLE LATE SUCCESSIONAL FOREST LEFT IN THE BLACK HILLS NATIONAL FOREST**

Here is a chart from the BHNF Revised Forest Assessments: Timber, October 2023 – it shows less than one percent of forest is in the late successional structural stage HSS5 (.5%). In your charts you indicate the Black Hills has 1% old growth. Where did you get the figure? I have seen .6% (less than 1%) but I never seen 1% in recent years. The .5% does not come from all management areas, just the ones covering a very large percentage of the forest.

Table 10. Change in HSS for ponderosa pine forest type in Management Areas 4.1, 5.1, 5.4, 5.43, and 5.6), 1995 to 2021.

[Source: 1995 RIS inventory and 2021 FSVeg inventory.]

| HSS   | Percent of Total Area (1997 Forest Plan Objective) | 1995 (acres) | 2021 (acres) | Change in Acres | 1995 (percent of total management area) | 2021 (percent of total management area) |
|-------|--|--------------|--------------|-----------------|---|---|
| 1     | 5%   | 13,050       | 71,463       | 58,413          | 1.5%                                    | 8.2%                                    |
| 2     | 5%   | 9,738        | 51,694       | 41,955          | 1.1%                                    | 5.9%                                    |
| 3A    | 10%  | 83,822       | 83,060       | -762            | 9.4%                                    | 9.5%                                    |
| 3B    | 15%  | 120,899      | 42,875       | -78,024         | 13.5%                                   | 4.9%                                    |
| 3C    | 5%   | 41,049       | 23,899       | -17,150         | 4.6%                                    | 2.7%                                    |
| 4A    | 25%  | 301,701      | 350,537      | 48,836          | 33.8%                                   | 40.0%                                   |
| 4B    | 25%  | 220,812      | 162,260      | -58,553         | 24.7%                                   | 18.5%                                   |
| 4C    | 5%   | 86,287       | 86,009       | -278            | 9.7%                                    | 9.8%                                    |
| 5     | 5%   | 16,480       | 4,704        | -11,776         | 1.8%                                    | 0.5%                                    |
| Total | 100%   | 893,839      | 876,500      | -17,339         | 100.0%                                  | 100.0%                                  |

Table 11. Change in HSS by density class, ponderosa pine forest type, Management Areas 4.1, 5.1, 5.4, 5.43, and 5.6), 1995 to 2021

Source: 1995 RIS inventory and 2021 FSVeg inventory.

This chart shows that in 1995 there was just 1.8% of these management areas in HSS5. This shows that the loss of old growth was not just from major fires or mountain pine beetle or logging to prevent fire or insects that occurred after 1995, but rather historic logging.

Historically (and currently) the Forest would have goals or standards of having 5% of the Forest in HSS5, but instead of tiering to forest wide HSS inventories, it would reduce the structural stages to 5% SS5 in each local timber sale. So, the area around the timber sale might have zero old growth but within the timber sale area it might have 20% old growth - but it would be cut back/reduced to 5%. Then years later the next timber sale would have a different shape, overlapping different version of this area and all could be cut back to 5% or less than 5% or none saved as HSS5 as generally not enough was left in the new shaped area. This shuffle would mean very little SS 5 left.

Thus, if any Forest sets goals/standards of percentages to be saved as old growth (late successional) or replacement future old growth, it should always be tiered back to forest wide inventories, not precepts found in the local areas.

## DOES THIS DEIS APPLY TO THE BLACK HILLS?

Does this DEIS apply to the Black Hills? At page 4 of the DEIS it says: *“Geographically, the scope of this proposed action applies only to areas meeting regional definitions and associated criteria of old-growth forest.”* Please clearly say which forests are excluded from the scope of the proposed action due to their definition and criteria for old growth being different from their regions definitions/criteria. Please also say which forests are excluded for any other reason. If this DEIS does not apply, the Forest Service needs to explain how it will protect future replacement old growth on the Black Hills or other ejected forests in some other way.

The Ecological Impacts Analysis Report indicates the Black Hills Old Growth definitions are different from the Regional Definition. Does this difference trigger an exclusion? -It says at page 63

*“The regional definitions for old-growth are based on Old-Growth Descriptions for the Major Forest Cover Types in the Rocky Mountain Region by Mehl (1992) and require that stands have a certain number of trees per acre over an age and size threshold; a certain number of trees with broken or dead tops; and a certain number of dead trees that are greater than a certain diameter limit. Numbers for each criterion vary by the dominant forest cover type: spruce/fir, Douglas-fir, lodgepole pine, ponderosa pine (broken out by the Front Range, Black Hills, and the Southwest), aspen, and pinyon-juniper.”*

*The Medicine Bow National Forest LMP (2003) and Black Hills National Forest LMP (1997) both cite the source of the regional criteria but do not provide which of the criteria are used in the plans. The Medicine Bow LMP uses the term ‘old-growth’ and provides a qualitative description of old-growth forests being distinguished by old trees and related structural attributes or characteristics as described in Mehl (1992). The Black Hills LMP uses the term ‘late succession’ in exchange for ‘old-growth’ but is still defined as “ecosystems distinguished by very large old trees and related structural features.” The LMP also uses the term ‘structural stage 5 (late succession)’, but this term’s definition is framed around characteristics specific to ponderosa pine (*Pinus ponderosa*).*

Trees in the Black Hills are considered late succession at 160 years old & the LRMP allows for open park like late succession and dense late succession.

## THREATS

Insects, fire & disease are not just independent threats to old growth by themselves. The logging to prevent or mitigate fire, disease & insects is a derived threat. Then there is the second logging entry to cut all the baby pines that sprout like weeds in the openings from your first thinning. Large diameter pines need to be cut to generate the KV dollars to pay for the non-commercial thinning of baby pine clogged understory. So logging is a huge and derived threat associated with the threat of insect, disease and fire.

In the Black Hills we have a huge threat of unsustainable logging. The timber industry and the politicians are unwilling to reduce the logging back to a sustainable level. Remember we have less than 1% old growth. Your DEIS 's or associated reports claim that logging as a threat to old growth is a dated problem from the past & natural threats like fire are the current threats. That claim is ridiculous in the Black Hills – were unsustainable logging is demanded by politicians. Logging is the current big threat to both existing and future replacement old growth.

The Black Hills needs old growth set aside with designations/protections in which logging to prevent insects, fire and disease can't be allowed. It needs future replacement old growth also set aside in areas where logging to prevent insects, fire and disease can't be allowed.

## MINING

At page 16 of Old Growth Forest's DEIS it says:

*“Mineral and Energy Resources: The potential for spatial overlap between mineral and energy resources and old-growth forest is minimal due to the small percentage of NFS lands currently known to be occupied by both resources. However, mineral operations could occur in old-growth forests as the proposed old-growth amendment is subject to valid existing rights for use and occupancy and the proposed old-growth amendment does not change the mineral status of the lands (i.e., does not propose a mineral withdrawal). There could be potential effects to the management and development of mineral and energy resources and there could be measurable effects to individual units of old-growth forests from minerals management. However, these effects are reduced by the agency's ability to apply environmental protection measures (design features and mitigation measures) and collaborate with mineral proponents on project design to ensure compliance with all laws, regulations, and policy. “ (Emphasis added)*

*In the Black Hills we have 20% of the Black Hills National Forest held under mining claims. We have a small amount, less than 1% existing as old growth. Sand Creek Inventoried Roadless Area (IRA) normally has mining claims in its' SE area. Existence of the mining threat was a reason for the BHNF to object to designation of parts of the Sand Creek IRA as an RNA. Sand Creek Roadless Area has some of best old growth stands left on the Forest.*

We suggest that some forests will need for their designated old growth & replacement old growth to be withdrawn from mineral entry. This may depend on how rare old growth is and how common mining claims are on the Forest. Mineral withdrawals need to be renewed every 20 years – they are not permanent. If an old growth area burns down badly, just don't renew the withdrawal.

Range of Natural Variability

We object to logging of old growth areas due to a FS plan to return the area to historic conditions. It is our experience in the Black Hills that the Forest Service's view of historical conditions is based on inadequate historical data, that can be challenged with alternative facts, that the Forest Service just ignores. We fear that the drive inside of the Forest Service staff to cut down more trees, harms their objectivity and they can't be trusted to study historical data in an objective way. Please don't allow for logging of old growth in order to return it to the FS alleged view of history.

#### Standards and Guidelines

The direction that protects old growth stands should be standards, not goals, objectives, guidelines or desired future conditions etc. We need standards because those can be enforced.

#### Old Growth Plan Required

Old growth planning – that results in protection for old growth, should be required of all Forest Service units that have forests -- it should not be discretionary.

Nancy Hilding

A handwritten signature in black ink, appearing to read "Nancy Hilding", with a stylized flourish at the end.

President  
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