



Norbeck Society
P. O. Box 9730
Rapid City, SD 57709

September 20, 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.

While Alternative 2 has its merits, we believe that due to the crises caused by nearly universal overshoot of our natural resources, more stringency is warranted. Therefore, some aspects of Alternative 3 should be integrated into the Final Decision namely those that offer more protection of mature and old growth forest from logging. We feel that the Forest Service has been provided with ample comments by many environmental and conservation groups to shape the final product of this effort into a meaningful plan of action.

We are concerned about page 4 of the DEIS where it says, “...for units that contain old-growth forests have management direction for the stewardship of existing and recruitment of future old-growth forest that they are resilient over time. This should include units that do not currently have old-growth technically speaking, but have the ability to develop old growth.

We support significant inclusion of tribal and indigenous knowledge and practices for forest management.

DEIS: Designation of old growth areas. Page 13. Comment: We commend the USFS for not carrying the formal designation of old growth areas forward as an alternative as suggested by several groups.

Appendix C: The Norbeck Society agrees with and supports the category 3 status assigned to the Black Hills National Forest. Given the inadequacies of the Black Hills National Forest LMP - proven by the inability of Forest Service to maintain Structural Stage Objectives for Old-Growth/Late Successional Stages handed down in a court decision- it is clear that the BHNF *should not be exempt* from this National Forest System Amendment and is in great need of the Standards it will provide.

Concluding, 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. We appreciate the opportunity to provide input on this critical topic.

Sincerely,

The Norbeck Society
P. O. Box 9730, Rapid City, SD 57709

info@norbecksociety.com