



**DEPARTMENT of AGRICULTURE
and NATURAL RESOURCES**

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October 22, 2024

Deputy Chief Chris French
Attn: FR Doc. 2024-18353
USDA Forest Service
1400 Independence Ave SW
Washington, DC 20250

RE: Comments on the FSM 2470, Silvicultural Practices

Dear Deputy Chief French,

The South Dakota Department of Agricultural and Natural Resources respectfully submits the following comments on the proposed changes to Forest Service Manual Chapter 2470, Silvicultural Practices.

Definitions:

Overstory Removal (OSR): We request the reference to advance regeneration remain in the definition of overstory removal. We also request that “or other vegetation” be removed from the definition. The essential characteristic of an OSR is that the new stand of trees is established before the overstory is removed.

2471.03 Policy

Bullet Point #5: We do not support changing the word ‘sufficient’ to ‘enough’ in the third sentence. Sufficient is more precise and suggests that both quality and quantity of information is available, while enough only relates to quantity and does not speak to the quality of information available. We believe that a Silviculturist should be using an appropriate amount of *quality* information in determining the prescription.

2471.3 Silvicultural Prescriptions

We believe the description provided should also include the following statement, “silvicultural prescriptions should also project treatments and their anticipated costs and returns through an entire rotation.”

2471.4 Forest Vegetation Monitoring and Evaluation

We ask that you add external partners (be it through cooperating agency status, Good Neighbor Authority Agreements, Stewardship Agreements, or appropriate agreement/partnership alliances) as potential members of the project interdisciplinary team.

Frequently, monitoring is not completed due to time, personnel, and cost constraints. We encourage the Forest Service to utilize partners to assist in accomplishing monitoring requirements.

Please consider inserting similar language, to bullet point #3 under Policy 2476.03, to the Forest Vegetation Monitoring and Evaluation section.

2476.02 Stand Improvement Objectives

Bullet Point #1: We do not support removing “for timber” from the reasons for conducting stand improvement activities.

Thank you for considering our comments.

Sincerely,

Amanda Morrison

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