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Comments: ? If Controlled Burns are anticipated to be the primary method of removing fuel from the Black Hills National Forest (BHNF) floor and controlling noxious/invasive weeds (both listed on the Federal and South Dakota State Declared listings), then it is imperative that all weather forecasts be coordinated at the South Dakota location, not the Forest Service/USDA Colorado weather site. Numerous catastrophic wildfires within the Black Hills National Forest (Northern, Central and Southern) from 1990 to present day are the result of not consulting with local atmospheric conditions.

? Just like the State of California and the California State Board of Forestry, there's always plenty of funding for fighting wildfires but limited or reduced funding to properly manage and reduce the fuel on the forest floor. Let's not emulate the Golden State's 2020 and 2025 glaring failures. Be proactive and start increasing the budget for clearing brush and forest floor fuel (to include the man-power to complete the stated goals for the BHNF within the budgeted funding).

?Controlling or eliminating noxious/invasive weeds through the use of controlled burns will not meet or exceed Federal forest management expectations.

Reference is made to Chapter 6: Potential Need for Forest Plan Changes - The following two narratives need to be adhered to if success is the goal for the Black Hills National Forest leadership teams:

* The current forest plan has an objective for the treatment of noxious weed infestations (objective 231 includes 'treat at least 8,000 acres per year...'), yet, as discussed in this document, treatment at that level has not been occurring due to budget constraints. Consider strengthening the forest plan direction for preventing the disturbances that exacerbate the spread of invasive species, especially when funding is not available for treatment to mitigate the results of those disturbances.

* Guideline 4303 identifies a priority order for treatment of noxious weeds; please consider proactively editing that guideline to be reflective of the priorities developed by the Black Hills Invasive Plant Partnership.

? Reference is made to Appendix B - Invasive Plants in the Black Hills National Forest. I have selected four (4) species accounts

? Reference is made to <https://fs.usda.gov/database/feis/plants/forb/linspp/all.html>

Yellow Toadflax (*Linaria vulgaris* Mill. (ITIS), otherwise known as Yellow toadflax, Butter and eggs, wild snapdragon, common toadflax, ramsted, flaxweed, Jacob's ladder.

Referenced documentation shows that immediate fire effect on plant toadflax is likely to be top killed by fire; however, its deep extensive root system is likely to survive even severe fire and allow reestablishment of the population from vegetative buds on roots. Toadflax plants have high survival rates and may even be promoted by fire.

Unless you are going to throw money at a manual (read shovel removal system, not spraying) plant removal program, then you will not meet your established removal/reduction criteria ending in 2025.

? Reference is made to <https://fs.usda.gov/database/feis/plants/forb/tanvul/all.html>

Common Tansy (*Tanacetum vulgare* L. (Asteraceae), bitter buttons, garden tansy, golden buttons

Referenced Studies documenting common tansy recovery, establishment, and/or increases or decreases in abundance on burned sites are lacking. Common tansy was reported within or adjacent to burned areas in Interior Alaska that burned in 2004 (Burned Area National-Interagency Team 2004, cited in [3]). Common tansy abundance was not reported and comparisons between pre- and postfire or burned and unburned sites were lacking. Although no studies (as of 2009) directly report on common tansy's response to fire, some sources suggest that prescribed fire alone would not control common tansy, and burning may provide habitat suitable for seedling establishment [19,40]. These sources suggest that fire may result in increased abundance or facilitate spread of common tansy.

If common tansy plants are burned at the flowering stage, surviving seeds may produce mutated seedlings. During a controlled experiment, common tansy flowers were heated with a magnifying glass until discolored (up to 15 seconds). Seeds from scorched flower buds sometimes produced seedlings that were mutated in some way. Common tansy seedlings were not specifically described, and potential growth changes, beneficial or not, are unknown (Pettersen 1961 as cited in [48]).

Biological control: There have been no insect, disease, or fungal biocontrols released for common tansy [101], but potential biocontrol insects have been identified and are being studied [40]. Domestic sheep and goats, however, may be useful biological control agents [19]. Cattle typically avoid common tansy; by grazing associated grasses and other vegetation, they may increase the area available for common tansy establishment and/or spread via rhizome growth [52]

? Reference is made to

https://efotg.sc.egov.usda.gov/references/public/MT/Invasive_Species_Tech_Note_MT1.pdf

Spotted Knapweed (*Centaurea maculosa*), also known as russian knapweed

Recommended documentation shows that in Montana, prescribed fire generally results in increased spotted knapweed populations and is not used as a control treatment. The effect of fire on plants is strongly influenced by the timing of burning. Most fires are prescribed in the spring or fall in Montana. In Michigan, annual prescribed fire in the summer reduced spotted knapweed on restored warm-season grass prairies. Burning spotted knapweed infested pastures or rangeland in the summer in Montana poses a high risk of wildfire and is generally not recommended. Add the State of South Dakota to the narrative.

? Reference is made to <https://www.nrcs.usda.gov/plantmaterials/mtpmstn7820.pdf>

Oxeye Daisy (*Leucanthemum vulgare*) otherwise known as bull daisy, button daisy, dog daisy, field daisy, goldens, moon flower, marguerite, midsummer daisy, whiteweed.

Oxeye Daisy is often sold in meadow, wildfire restoration and erosion control seed mixes used by Forest Service contractors. So to say that the Forest Service has an interest in reducing or eliminating Oxeye Daisy from forested areas is an oxymoron.

Recommended documentation shows that in a 28-year study, annual spring burning of grassland in Sweden did not affect populations of oxeye daisy. However, there are two considerations where prescribed fire is planned. First, fire exposes bare, mineral soil and favors the germination and establishment of oxeye daisy seeds and seedlings. Second, fire may increase or decrease nitrogen in the soil. Decreased nitrogen favors oxeye daisy over forage grasses in competitive interactions and increased nitrogen may have the opposite effect. To reduce the risk of increased oxeye daisy after prescribed burning, deferred grazing and herbicide management are recommended. Where there are no competitive plants or in forested plant communities where prescribed fire is planned, herbicide management and re-vegetation are recommended along with deferred grazing (read

increased costs).

Herbicidal Control - On pastures and rangeland, oxeye daisy can be temporarily suppressed by aminopyralid, metsulfuron, picloram, or 2,4-D. The recommendation for picloram is one pint product (Tordon 22K® or Picloram22®) per acre to actively growing plants before bloom or to fall re-growth. This rate applied to rosettes in mid-May provided two years control on a forest meadow site. On that site three years after treatment, an average of 23 rosettes/m² was measured. The recommended rate for metsulfuron is one ounce per acre product (Escort® or Cimarron®) applied to rosette plants in the spring (May). This treatment also provided two years of control on the forest meadow site with an average of nine rosettes/m² three years after treatment. The metsulfuron treatment was not statistically different than the picloram treatment. A non-ionic surfactant is needed in the spray solution at 0.5% by volume for metsulfuron to be effective. The label rate for aminopyralid is 4 to 6 ounces product (Milestone®) per acre to plants in the pre bud stages. Pre-bloom foliar applications of 2,4-D at 2 quarts per acre with repeated applications to re-growth can also be used. Glyphosate applied at one to two quarts per acre will kill oxeye daisy on cropland or where re-vegetation is planned. Label information for all herbicides should be carefully followed not only for application restrictions but also for restrictions that apply to grazing and harvest of forage after application.

? The amended forest plan has an objective to treat at least 8,000 acres of invasive plants annually (objective 231), but the amount treated is restricted by the availability of funding. The acres of invasive plants treated from 2003 through 2022 (USDA Forest Service 2018 and Forest Service Activity Tracking System database) is shown in figure 1. The steady decrease in acres treated is directly related to available funding. For example in 2006 the forest was funded to treat over 15,000 acres, while in 2018 the funding received was enough to treat just over 3,000 acres. During that same time period an increase in recreation USDA Forest Service (particularly off-road vehicle traffic), large-scale logging activities and wildland fires considerably exacerbated the weed issues (USDA Forest Service 2018). The forest currently accomplishes weed treatments through contract, cooperative agreements with all six counties, as well as in-house.

Chart - https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1153849.pdf

At one time, the Forest Service received the news of increased recreational vehicles as a good thing. Now you partially blame it as a source of reduced funding.

The 2024 Standard Annual Pass in conjunction with the Forest Recreation Management saw a increase for 2025 but brought in no revenue for other programs. The Annual Motorized Trail Permit is still listed at \$ 25.00 (unless it too has increased in price). Not knowing how many of the Trail Permits are sold annually, would the revenue stream significantly increase if the permit was priced at \$ 50.00 for ATV/Side-by-Side (and the funds go toward real forest management, not Hot Shot Teams and helicopter fuel)