



Ecological Integrity of Rangeland/ Non-Forested Ecosystems: Status, Trend, and Use

Comments and Responses on Draft Assessment



A dirt road traversing typical grasslands and shrublands in the Black Hills National Forest.

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Introduction: Assessment Response to Comments

The Black Hills National Forest received a variety of public comments on draft assessments published in June 2022. Some commenters have expressed support for the draft assessments, while others have expressed concerns.

Those who express concern about the draft assessments often state that they believe the assessments do not go far enough in addressing the challenges facing the Black Hills; do not address the needs of local communities; or do not utilize the best available scientific information. Those that support the draft assessments often state that they are pleased with the level of detail and analysis that went into the assessments. They believe it will provide a good foundation for the need to revise the land management plan.

The Forest Service has reviewed all public comment received on the draft assessments and used this feedback to revise assessments where appropriate. The table below is a detailed summary of public comment received related to rangelands and non-forested ecosystems as well as the agency's response to each item. Many responses indicate where the revised assessment has been modified to better explain each item, or incorporate new information as provided by cooperators or the public.

Each comment and response table is provided not as a matter of regulatory compliance, but as an effort to demonstrate the Black Hills National Forest's commitment to transparency early in the plan revision process. Some comments below have been generalized or combined with similar comments to provide a more efficient response. No attempt has been made to retain a link between each comment and individual, organization, or entity that provided it.

Response to Comments

Comment	Responses
<p>The draft assessment presents the current forest plan direction for provision of forage allocation by the pound for livestock and wildlife. The Department recommends these allocations be revisited and revised, if necessary, in the new plan to reflect landscape changes that have occurred over the past two decades. Language within the forest plan should allow for amendments to forage allocations if forage availability changes drastically on the Forest due to unforeseen events. Similarly, the populations of deer and elk for which the plan intends to provide forage should be reviewed and updated as needed.</p>	<p>We agree the current forest plan direction of forage allocation needs revisited. The following language has been added to the document to address your comment regarding wildlife populations...<i>The Forest Service, as the land management agency, manages the forage resource and wildlife habitat, but we do not control the wildlife numbers. The State agencies are responsible for managing the wildlife populations. The management plans for wildlife can be found on the agencies' websites... South Dakota Game Fish and Parks (https://gfp.sd.gov/management-plans/) and Wyoming Game and Fish Department (https://wgfd.wyo.gov/Habitat/Habitat-Plans).</i></p>
<p>The Norbeck Society finds the Non-Forested Ecosystems Assessment an open door that could lead to needed new Black Hills National Forest thinking about the foundational values of the Forest (in this case, the grasslands and shrublands) as primary targets for ecosystem integrity management. Commodity-type products and services such as livestock grazing would become secondary and recognized as tools used appropriately to support and achieve ecosystem integrity. The “dog” (integrity of non-forested ecosystems) should wag the “tail” (livestock grazing), not the reverse.</p>	<p>Thank you for your comment. Forest plan direction will develop throughout the plan revision process.</p>

*Black Hills National Forest
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<p>In Norbeck Society’s vision, the Rangeland Management Assessment should be appended as part of the Non-Forested Ecosystems Assessment. As a point to note, the seven pages of Forest Plan Goals, Objectives, Standards and Guidelines related to livestock grazing included in Appendix B of the Non-Forested Ecosystems Assessment are conspicuously missing (also not cross-referenced) from the Rangeland Assessment. The consequence of this is that livestock grazing as described in the Rangeland Assessment appears to cause very little impact. This doesn’t mesh with impacts Norbeck Society members witness as they are out hiking and roaming Black Hills National Forest grasslands/allotments during the grazing season.</p>	<p>Thank you for your suggestion. The rangeland and non-forested ecosystems assessments have been combined into a revised assessment.</p>
<p>Table 2. Summary of Forestwide rangeland condition is meaningless. Please cross-reference Norbeck Society comments on the lack of Best Available Science in any rangeland health determinations. Most importantly, Rangeland metric of “acres moving toward forest plan objectives” has no objective standards and is determined from data collected using protocols that are not repeatable, not precise and not accurate. There are Best Available Science protocols Black Hills National Forest Rangeland program is choosing to ignore (e.g., Robel pole calibrated for the Black Hills, Multiple Indicator Monitoring of Streams and Streambank Vegetation).</p>	<p>As noted in the document, the current forest plan identifies satisfactory and unsatisfactory range conditions; the protocol used most often for determining trend (the cover-frequency protocol, as noted in the document) is most certainly repeatable, precise, and accurate. We do use Multiple Indicator Monitoring (MIM) for monitoring riparian areas. The Robel pole is a short-term monitoring protocol, used for measuring residual cover, which is not relevant to the discussion of long-term monitoring. The document has been edited for clarity.</p>

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<p>What was used to make the determinations in Table 3. Summary of Terrestrial Ecosystem Integrity and Trends? Norbeck Society finds no explanation of metrics entering into Low, Moderate or High determinations. What Best Available Science was used?</p>	<p>Thank you for your comment, the rangeland and non-forested ecosystems assessments have been combined and edited for clarity.</p>
<p>There is more discussion of the ponderosa pine ratings in the Forested Ecosystem Integrity Assessment than the grassland and shrubland ratings in Table 3.</p>	<p>Thank you for your comment, the rangeland and non-forested ecosystems assessments have been combined and edited for clarity.</p>
<p>There is a very bad idea included in the Non-forested Assessment that Norbeck Society also noted in the Rangeland Management Assessment: “Consider editing the current forest plan definition of satisfactory and unsatisfactory range conditions to include “as influenced by livestock grazing management” or editing the definition to acknowledge drivers that are completely unrelated to livestock grazing management.”</p> <p>This is the exact opposite direction Norbeck Society believes management of non-forested ecosystems should be going. Rangeland management has hidden too long behind other forest uses/users. Rather than trying to hang back until every other multiple use/user has stepped forward to solve a problem in a non-forested ecosystem, rangeland managers need to sit down with all parties and work out solutions multi-disciplinarily.</p>	<p>The Forest seeks to evaluate and understand all social, ecological, and environmental vectors contributing to the condition of rangelands and looks forward to continued discussions and collaboration on plan components during the plan development phase of the revision process.</p>

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<p>Norbeck Society has observed at times that Rangeland Management is most concerned with getting livestock out on the Forest – and believes everyone else should keep livestock where they’re supposed to be. One simple example experienced by a Norbeck Society member was a case of livestock consistently in wrong pastures in the allotment around their house/private land. The Black Hills National Forest range manager and permittee insisted it was gates were being left open by Off Highway Vehicle (OHV) users, so there was nothing they could do. After two grazing seasons of chronic unauthorized use, a neighbor to the allotment suggested that an easy open/closer gate mechanism on one particular gate might help. Black Hills National Forest asked the permittee to install, and it was done. Amazingly, the problem of chronic unauthorized use was solved! Because the gate had been too tight, when legitimate forest users opened the gate to get through, they didn’t have the equipment needed to stretch and close. This is a simple but insightful example of Rangeland Management pointing blame to another management activity and walking away rather than stepping up to deal with a multidisciplinary issue and find a solution.</p>	<p>The Forest continually strives to collaborate and cooperate with permittees, partners, private landowners, and other forest users to evaluate and increase the effectiveness of range management on National Forest System lands. Management strategies, goals, and objectives will be discussed and considered during the plan development phase of the revision process.</p>

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<p>The idea presented in this assessment of protecting ranching operations is very biased and undesirable. In managing forested ecosystem integrity, logging jobs have been a part of arguments in favor of continuing high outputs of timber from Black Hills National Forest. However, Best Available Science analysis of Forest Inventory Analysis Data shows that more trees are being removed from Black Hills National Forest than establishing. Such a depletion trend is not supportive of forested ecosystem integrity. Ecosystem integrity outweighs desire to keep timber industry employees at work. Ranching jobs must be treated the same – integrity of non-forested ecosystems comes first.</p>	<p>The Forest rangeland management program has two prongs - a need to maintain a viable permitted livestock grazing program and a need to manage native plant communities which evolved under disturbance (i.e., grazing). As noted in the assessment, <i>Livestock grazing has been, and continues to be, an important use of the Black Hills National Forest. Several of the ranching operations in the area rely on public lands (e.g., national forests and grasslands, state, and Bureau of Land Management lands) for livestock grazing. Supporting these ranching operations helps ensure the maintenance of open spaces and reduces the number of issues associated with the wildland-urban interface.</i> Reference to the County comprehensive plans for the area have been added to the assessment.</p>
<p>Cross-reference Norbeck Society comments in the Rangeland Management Assessment regarding fresh thinking needed to manage non-forested/rangeland that would better protect vulnerable areas like riparian areas and grassland/shrubland/forested herbage (including setting up grassbanking areas that would allow vegetation rest; redesigning allotments; adding significant variety in timing and intensity of livestock grazing, etc.). These would allow for greater ecosystem resiliency to disturbances like wildfire, invasive species and flood.</p>	<p>Thank you for your comment. As noted in the assessment, resiliency is built into adaptive management and the need for maximum management flexibility exists. Management strategies will be considered further during the plan development phase. The assessment phase is meant to provide information on existing forest conditions and trends.</p>

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<p>When the assessment refers to ecosystem services, it is defined as human benefit from non-forested ecosystems. Norbeck Society believes Black Hills National Forest definition should be expanded to include benefits passing between all ecosystem components to each other – all living things and dynamic processes. Humans need to recognize we are in a give-and-take relationship with ecosystems, too.</p>	<p>Ecosystem services are specifically defined in the Planning Rule (36 CFR 219.19):</p> <p>Ecosystem services. Benefits people obtain from ecosystems, including:</p> <ol style="list-style-type: none"> (1) Provisioning services, such as clean air and fresh water, energy, fuel, forage, fiber, and minerals; (2) Regulating services, such as long-term storage of carbon; climate regulation; water filtration, purification, and storage; soil stabilization; flood control; and disease regulation; (3) Supporting services, such as pollination, seed dispersal, soil formation, and nutrient cycling; and (4) Cultural services, such as educational, aesthetic, spiritual and cultural heritage values, recreational experiences, and tourism opportunities. (36 CFR 219.19).
<p>As in other assessments, the full range of goals, objectives, standards and guidelines provided that pertain to management of non-forested ecosystems is impressive. But once again, Norbeck Society has no idea what requirements or guidelines were implemented, where and when, over the life of the current Forest plan. Without monitoring, we don't know if non-forested ecosystem conditions have gotten worse or better. This makes for an awkward situation.</p>	<p>Thank you for your comment. The rangeland and non-forested ecosystems assessments have been combined and edited for clarity.</p>
<p>NEEDS FOR CHANGE:</p> <p>1) Protect the eight remnant, high-quality Black Hills Montane Grassland occurrences in a formal protective designation such as a M.A. 3.1 Botanical Area. Black Hills Montane Grassland communities are only found in the Black Hills and considered critically imperiled locally and globally.</p>	<p>Thank you for the comment. This information will be considered during the plan development process.</p>

*Black Hills National Forest
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2) Expand non-forested ecosystems health indicators beyond values for livestock grazing. The goal is long-term ecosystem integrity – maintaining composition, structure, and all functional attributes. Monitoring must be developed and implemented to determine and track health of non-forested ecosystems.	Thank you for the comment. This information will be considered during the plan development process.
3) Change Objective 301 so that future variability in grass production due to climate change is considered when determining forage levels available for livestock. Long-term plant health must be prioritized over livestock grazing in non-forested ecosystems.	Thank you for the comment. This information will be considered during the plan development process.
Need for change: As the basis for all uses on the forest, Forest Plan Goals must emphasize, prioritize, protect, and improve ecosystem health.	Thank you for the comment. This information will be considered during the plan development process.
Improper livestock grazing should be addressed in Annual Operating Instructions (AOI) in cooperation with livestock grazing permittees. According to the Black Hills National Forest Rangeland Management Assessment this is currently done on an annual basis.	Forest Service Rangeland Management Specialists and livestock grazing permittees communicate and collaborate often on grazing and pasture management strategies including deviations from Annual Operating Instructions.