

September 16, 2020

Mr. Jerry Kruger
Acting Forest Supervisor
Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730

RE: National Forest Advisory Board Recommended Actions: Forest Land and Resource Management Plan Revision

Dear Supervisor Krueger:

The Black Hills National Forest Advisory Board (NFAB) affirmatively supports the Board's Timber Sustainability Working Group recommendations for action regarding the National Forest Land and Resource Management Plan (Forest Plan) Revision.

Background: The Black Hills National Forest (BHNF) is currently working under the direction of a Forest Plan which was completed in 1997. Since completion, the Forest Plan has undergone two amendments; the most recent was completed in 2005.

The BHNF has also experienced considerable change since 1997. A mountain pine beetle epidemic began in 1996 and ended in 2016 affecting 450,000 acres (29%) of the forest. Wildfire has affected almost 220,000 acres (14%) of the forest. The BHNF measures its suitable timberland using internal inventories (FSVeg) and the national Forest Inventory Analysis (FIA) program. According to those inventories between 86,148 acres (FSVeg) and 104,873 acres (FIA) of suitable and accessible timberland has been re-classified to non-forest or non-stocked due to disturbance.

The effects of mountain pine beetle, extreme weather events, and expanded fire season have changed the condition of the Forest which requires re-evaluation of the plan's desired future conditions, objectives, standards and guidelines.

In addition, the National Forest Management Act requires a plan revision "at least every 15 years." 16 USC 1604 (f)(5).

The process of revising a Forest Plan is a significant task. The process can take up to four years and requires considerable funding and human resources. These costs could negatively impact the ability of BHNF to deliver goods and services to the public.

Recommended Action: Given the scope of changes which have affected the BHNF, and the requirement that Forest Plans should be revised every fifteen years, the NFAB recommends the BHNF begin the Forest Plan revision process as soon as possible. Further, the NFAB recommends the BHNF secure adequate funding and resources to complete the Forest Plan revision without negatively impacting the ability of the BHNF to provide goods and services.

Sincerely,



Danielle Wiebers
Chair, National Forest Advisory Board