



November 29, 2022

Jeff Tomac  
Supervisor  
Black Hills National Forest  
1019 N. 5th Street  
Custer, SD 57730

Mr. Tomac:

Thank you for the time and attention you have given to the Black Hills National Forest (BHNF). We also applaud you, and others within the Forest Service (FS), for your continued work on the “timber-by-rail” program that seeks to bring timber to mills that have capacity to put the wood to a productive use. That program will not only serve the greater public by introducing more wood products into a very tight market, but it will also support the rehabilitation of fire-damaged landscapes.

However, we continue to have concerns about the future of the BHNF. The BHNF is immensely important to Wyoming and South Dakota, to our citizens, and to our visitors. We are concerned about the outcome of the Black Hills National Forest Land Management Plan and the USFS’ first attempt at assessing the BHNF’s current conditions.

The BHNF Plan revision assessments included countless statements that are not backed by scientific material. Providing these assertions without scientific authority hinders our ability to meaningfully engage in the revision process. An adequate assessment should contain citations to supporting authority and discuss why one scientific view was adopted over others that were discarded.

The assessments also fail to include critical and readily available information that accurately portrays the current conditions of the Forest and should inform the NEPA analysis moving forward. Our states have identified errors within GTR 422 in both the data analysis and assumptions, including a failure to properly account for merchantable tree species, tree growth, reduction in timber resources, and inaccurate mortality rates. The FS has claimed that the GTR is not a policy or a decisional document – and yet it was referenced and relied upon more than a

dozen times in the BHNF assessments. The assessments did not reference other documents or formal recommendations, including the recommendation from the National Forest Advisory Board. Given this clear reliance on the GTR, if the inaccuracies are not addressed, it will be difficult for our states to have confidence in the outcome of the Forest Plan Revision.

We understand a review of the GTR is underway and we would welcome a meeting to discuss our concerns as part of that review. We also ask that the new assessments avoid relying on the GTR until our concerns with its methodology are rectified. We urge the FS to work closely with the states, counties, and other stakeholders to address those information gaps and issue revised draft assessments for public review again before they are finalized.

In addition, we are concerned about the apparent desire of the FS to drastically reduce the timber program in the BHNF. The mills in our region are critical infrastructure, and our states have already experienced several mill closures. They allow for the proper management of the forest, and they supply the region, and beyond, with products that are critical to society. They also help landowners recover from devastating fires, as we are currently seeing on land burned by the Fish Fire. We simply cannot afford to lose this infrastructure. We have seen the ramifications in other states after they lost their mill infrastructure and we do not want to suffer similar fates.

Again, we request that the FS produce another set of draft assessments with a public comment period, that those assessments include citations for factual statements, and that they contain discussion of why one authority was relied upon over another. We look forward to meaningful participation in the BHNF Forest Plan Revision process.

Sincerely,



Governor Kristi Noem  
State of South Dakota



Governor Mark Gordon  
State of Wyoming