



The Norbeck Society

March 20, 2022

Jeff Tomac, Supervisor
Jerome Krueger, Deputy Supervisor
Jeff Underhill, Forest Silviculturist
Black Hills National Forest
1019 North 5th Street
Custer, SD 57730

Re: Spruce Vegetation Management Project EA

Dear Supervisor Tomac, Deputy Supervisor Krueger, and Silviculturist Underhill,

As part of our mission to advocate for sustainable use of public lands, Norbeck Society comments reflect a desire to support a management approach for the Black Hills National Forest (BHNF) that recognizes the imperative of protecting and enhancing the biocomplexity of forest ecosystems that serve and support growing numbers of people. A vision for long-term sustainability of all aspects of the land is paramount. Despite decades of data and analysis that have developed a much clearer understanding of how our natural systems work, it seems that opportunistic/capitalistic ideologies continue to outcompete more conservative approaches to forest management.

The Black Hills National Forest is a grand resource from which many people draw a multitude of benefits. Cultural, recreational, spiritual, botany and wildlife, watershed protection, commercial (timber, forage, minerals) assets have enriched us in many ways and for a long time. The Norbeck Society wishes to ensure these benefits flow perpetually to those who come after us. People in the future will rely on the graces of the Black Hills National Forest just as we do.

On the following pages, you will find our comments on the proposed Spruce Vegetation Management Project EA.

Thank you for the opportunity to provide input to the USFS about the management of the BHNF.

Sincerely,
The Norbeck Society

Norbeck Society Scoping Comments
Spruce Vegetation Management Project EA
Forest wide, Black Hills National Forest
March 22, 2022

President Biden's 30 x 30 Initiative shines a spotlight on the fact that we need to "get it right" every place we can – even on the Black Hills National Forest (BHNF). The American public deserves full accountability of the U.S. Forest Service. The responsibility of ensuring the continuing ability of the land to provide so much, and in so many ways, is great and we acknowledge that issues surrounding management of this resource are deeply complex.

After a quarter century of loss to wildfire and Mountain pine beetle, and amidst continued unsustainable logging, the U.S. Forest Service ponders and asks the public for input about multiple projects that will log remaining patches of mature forest on the Black Hills National Forest of western South Dakota and northeastern Wyoming:

These comments are for the Forest Wide: Spruce Vegetation Management Project EA which logs up to 30,000 acres of spruce and spruce-mixed forest on the BHNF (comment deadline March 25)

We note that Forest Service is requesting an extraordinary amount of public comment in a very short period of time. Forest Service also has these scoping letters and information out for public comment:

- Bearlodge District: Isolated Parcels Hazardous Fuels Reduction (comment deadline April 5)
- Mystic District: Westside Project EA (comment deadline April 6)
- Northern Hills District: Chimera Vegetation Management project EA (comment deadline April 9)
- Theodore Restoration Project (comment deadline April 23)
- Additionally, Forest Service expects to release Forest Planning Assessments for public comment on April 1 (comment deadline May 1)

The project proposals listed above overlap two recent Forest-wide projects still being employed:

1. the Mountain Pine Beetle Response Project (ROD 2012 - to address dense stands)
2. the Black Hills Resilient Landscapes Project (ROD 2018 - to clearcut 185,000 acres of sparse stands / bring the forest into alignment with Forest Plan Habitat Structural Stage Objectives.)

Also, a plethora of current and recent-past CEs clear the way for cutting thousands of acres of forest.

This is happening on a National Forest with a long track record of inadequate follow-up treatments, and little to no monitoring. Further:

- the best science available shows the current rate of logging is unsustainable.
- efforts to create a new Forest Plan are just beginning, and there is great need for implementation of a new Forest Plan.

The SPVM proposal begs the questions: Why this? Why now?

U.S. Forest Service should not proceed with the Spruce Vegetation Management Project (SPVM)

Claims made to justify the Spruce Vegetation Management Project are not supported by fact:

1. In the scoping information, Forest Service has presented no evidence of a need to “reduce the number of acres dominated by White spruce (*Picea glauca*)” or that the acreage Forest Service claims to be Spruce even exists. Exactly how many acres of Spruce dominated acres are on the forest?

For example, there seems to be a disparity of reported *Picea glauca* stand range when comparing the map of potential treatment areas of the proposed 2022 Spruce Vegetation Management project with a 2016 range map of the BHNH.

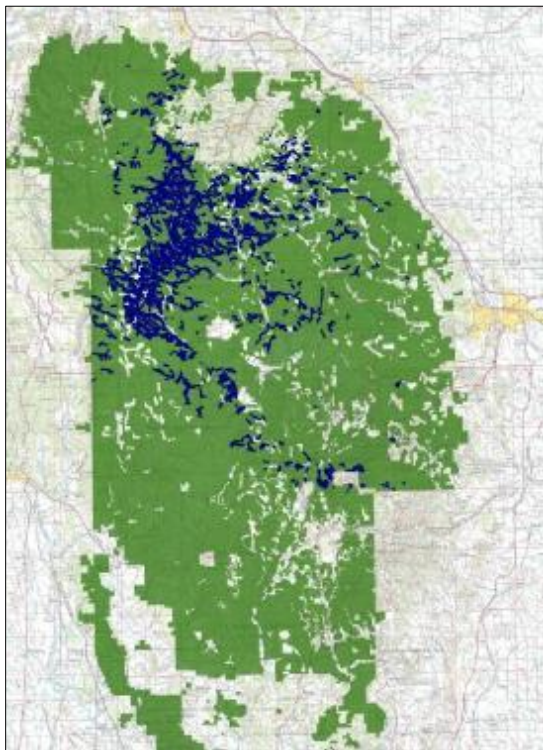


Figure 1: Map of proposed 2022 Spruce Vegetation Management Project. Spruce range in blue.
[117452_FSPLT3_6392507.pdf \(usda.gov\)](https://www.usda.gov/117452_FSPLT3_6392507.pdf)

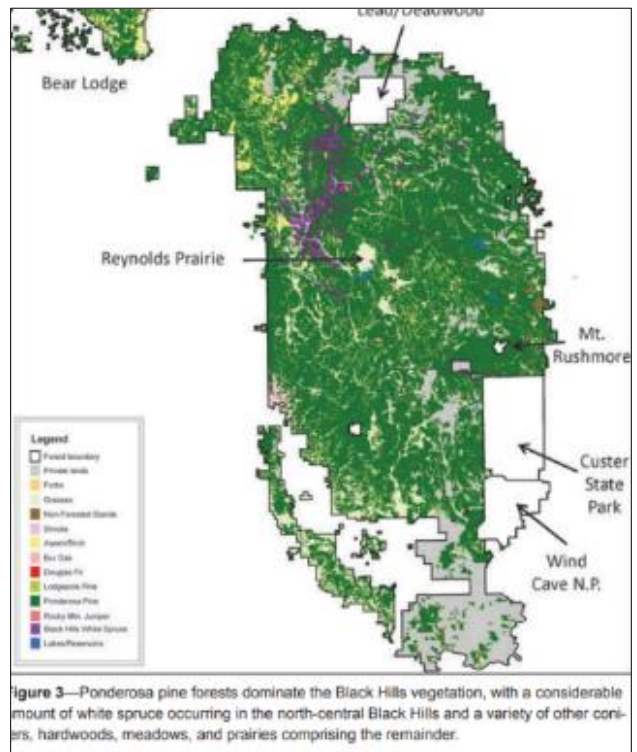


Figure 3—Ponderosa pine forests dominate the Black Hills vegetation, with a considerable amount of white spruce occurring in the north-central Black Hills and a variety of other conifers, hardwoods, meadows, and prairies comprising the remainder.

Figure 2: Map of location and sizes of different tree strands in the BHNH. Spruce range in purple.
U.S. Forest Service Rocky Mountain Research Station General Technical Report #353, page 3 (page 13 of pdf). September 2016.
[Mountain pine beetles: A century of knowledge, control attempts, and impacts central to the Black Hills \(fs.fed.us\)](https://www.fs.fed.us/mountain/pine-beetles/a-century-of-knowledge-control-attempts-and-impacts-central-to-the-black-hills/)

The SPVM proposal could further stress areas recently affected by natural disturbances.

Parts of the potential Spruce Vegetation Management Project area have been affected by tornados in recent years:

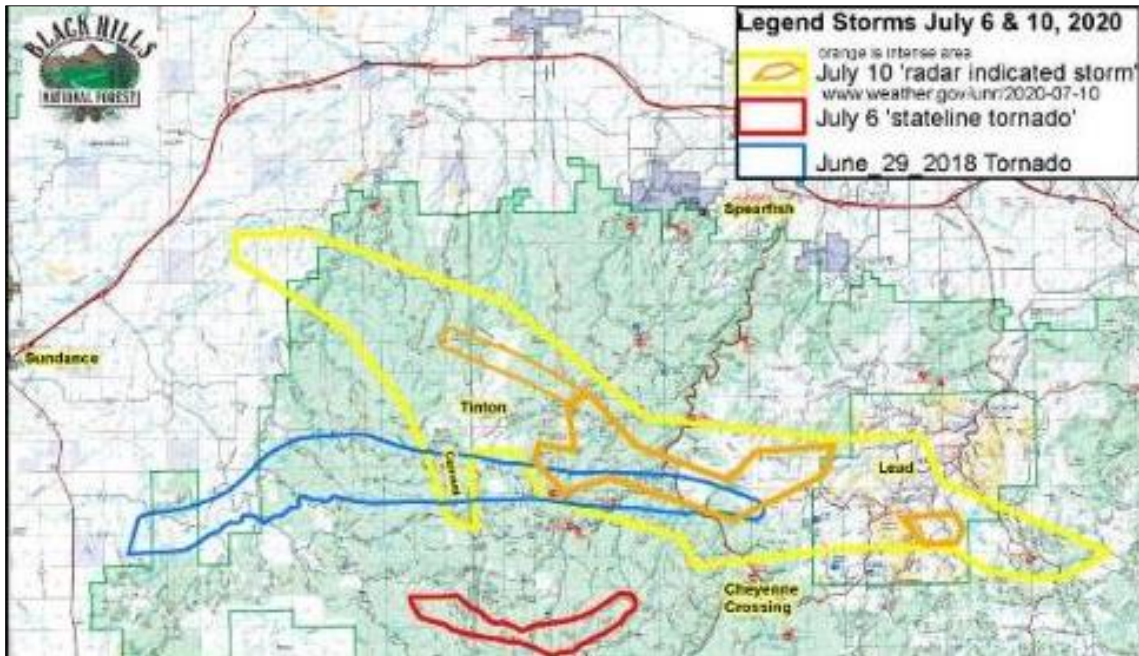


Figure 3: 2020 map of recent tornado disturbances in the northern BH.
[Black Hills Loggers Scramble To Salvage Tornado-Damaged Timber \(sdpb.org\)](https://www.sdpb.org)



Figure 4: 2021 Photo from within the proposed project area

The SPVM proposal suggests logging near previously logged areas, whose recovery status is unknown due a lack of monitoring.

Current cuts, mostly clearcuts, from the Black Hills Resilient Landscapes project – “BHRL” (ROD 2018) and thinning from the Mountain Pine Beetle Response project – “PBR” (ROD 2012): Many of the areas that are part of the SPVM project have just been cut or are neighboring areas just cut in the BHRL or PBR projects. Final monitoring for PBR has not been done. No monitoring has been done for the BHRL project (counter to promises made by Forest Service in the ROD and Objection Response.) Planning and implementing more projects without taking the time to determine impacts of previous ones is a major threat to this ecosystem’s health and services.

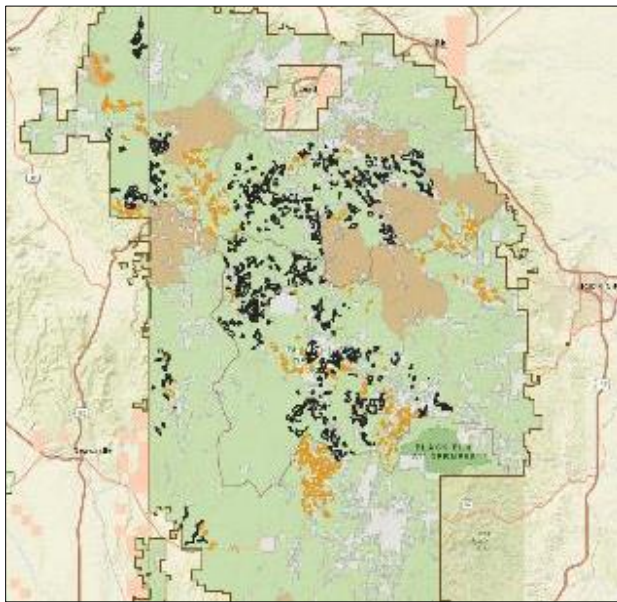


Figure 5: BHRL implemented cuts map

[Black Hills Resilient Landscapes Project Implementation \(arcgis.com\)](https://arcgis.com) - BHRL

Timber harvests tab map show logging units, mostly clearcut. Black is complete, gold is about to be cut under a project already in place, and tan are areas where similar treatment is imminent.

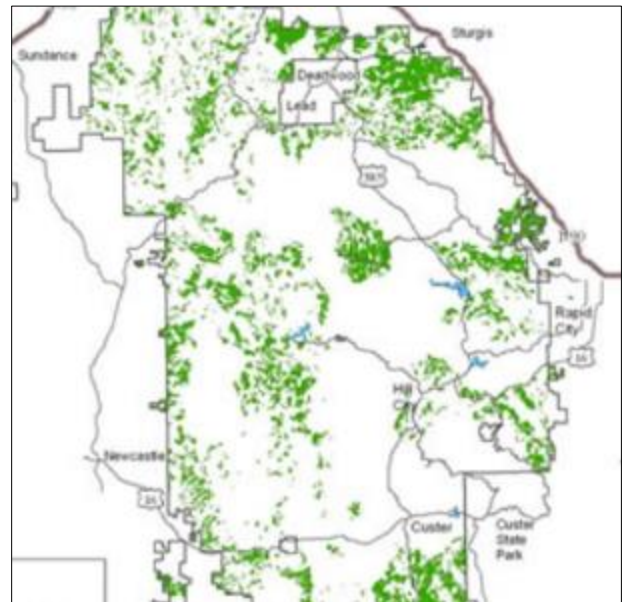


Figure 6: PBR vicinity map

[Forests and Rangelands Success Story](#) - PBR

Most of the potential treatment areas in the Spruce project have had extensive logging in the BHRL project and the Mountain Pine Beetle Response Project.

More evidence the SPVM proposal area has already been heavily logged.

Satellite photos - This GoogleEarth screen shot shows a portion central in the Spruce project in satellite photos dated 2016- *before* the logging done in the Black Hills Resilient landscapes project (mostly overstory removal) which is shown immediately below the Googleearth image.



Figure 7: showing larger area



Figure 8: close-up of area encircled in yellow in figure 7

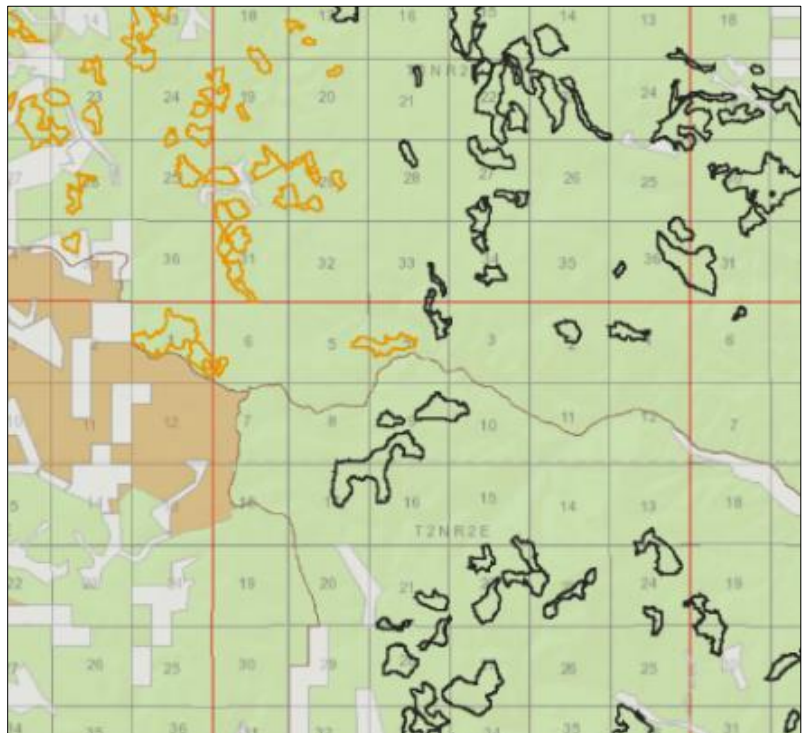


Figure 9: Same area from the BHRL implementation map

Cumulatively over 30 years, there has been much logging in the area of the proposed project.

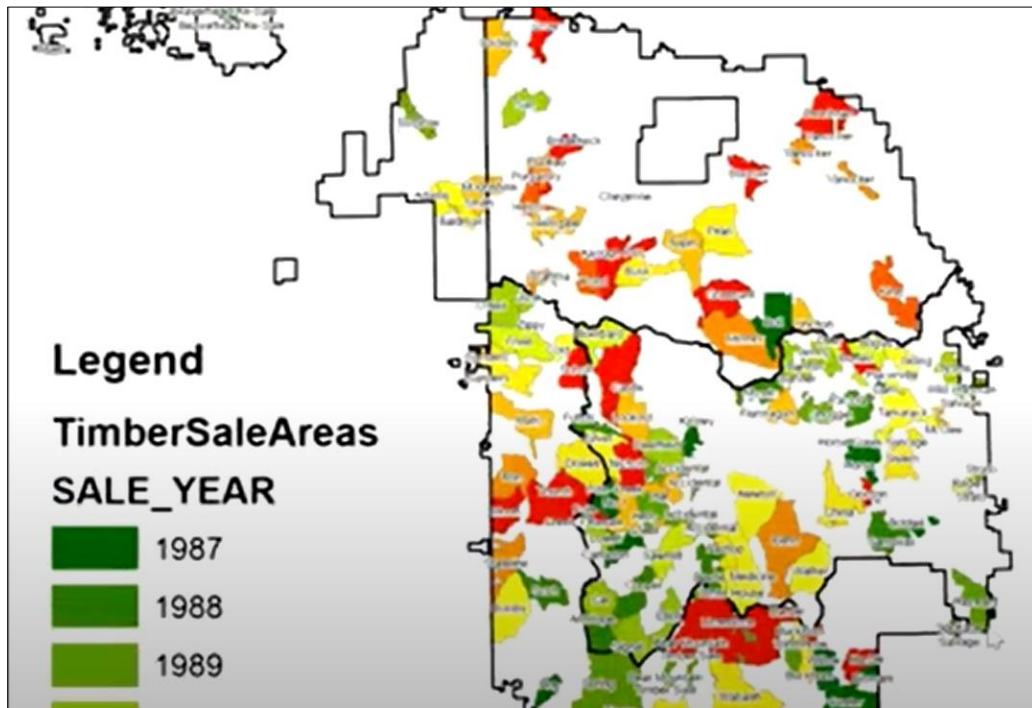


Figure 10: Timber sale areas 1987 -1997

[11-16-2021 Pennington County Board of Commissioners Meeting - YouTube](#)

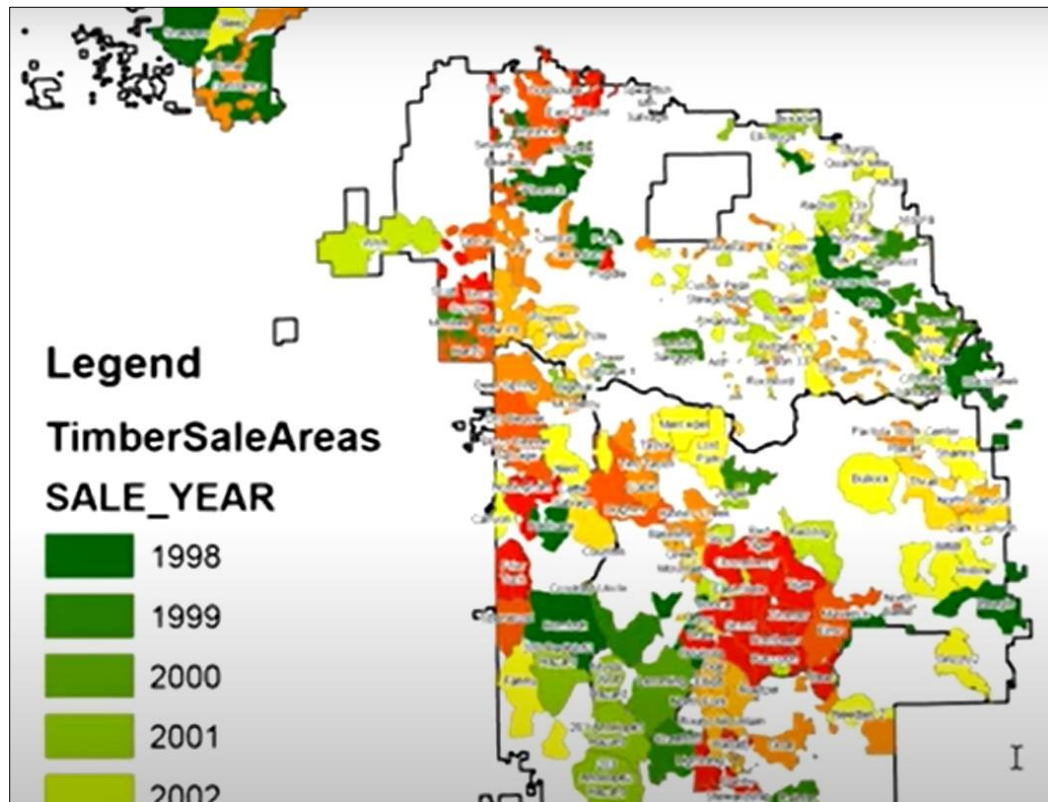


Figure 11: Timber sale areas 1998 - 2009

[11-16-2021 Pennington County Board of Commissioners Meeting - YouTube](#)

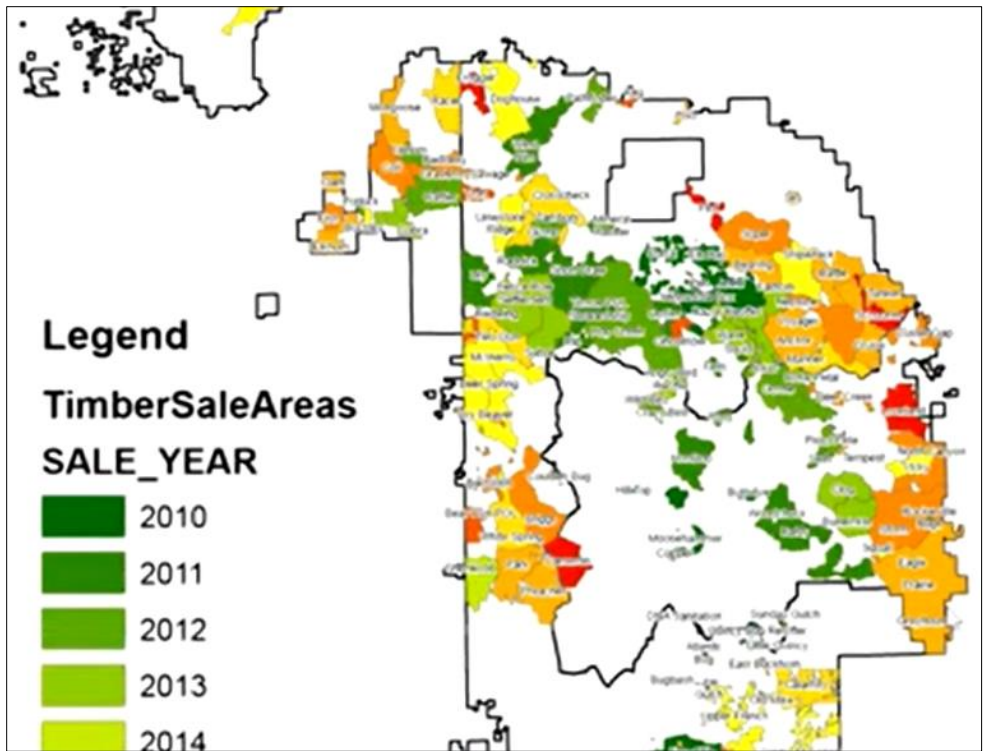


Figure 12: Timber sale areas 2010-2021
[11-16-2021 Pennington County Board of Commissioners Meeting - YouTube](#)

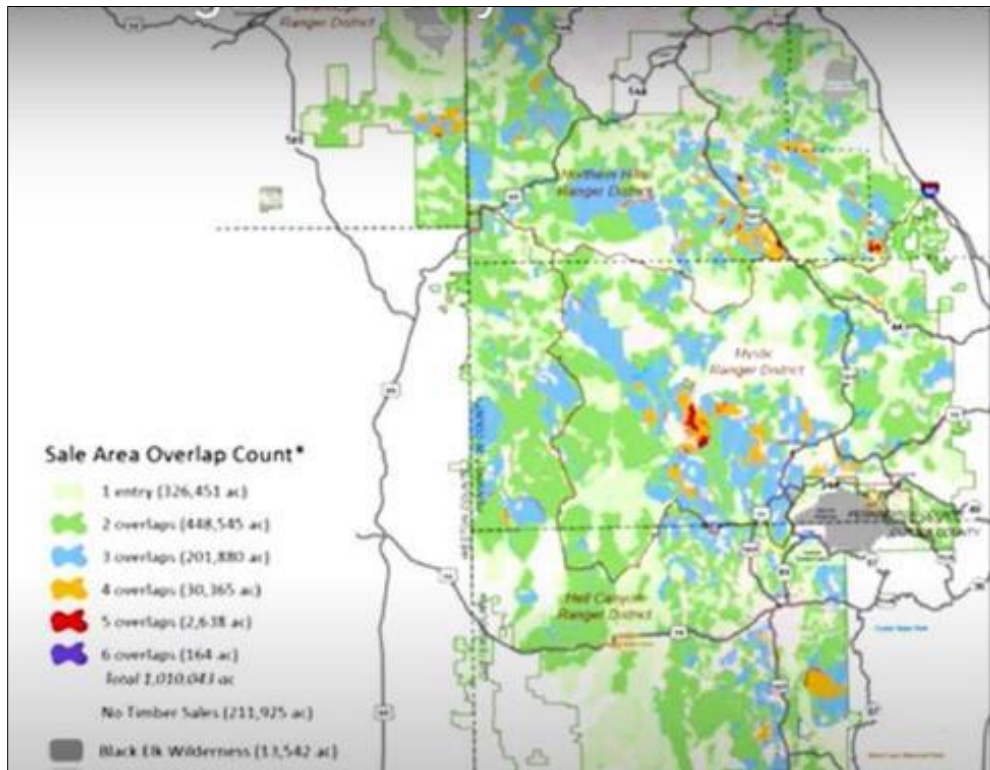


Figure 13: cumulative view of 30 years of aggressive management across the Forest
[11-16-2021 Pennington County Board of Commissioners Meeting - YouTube](#)

Much Spruce and mixed Spruce with Pine and Aspen has already been logged and there is abundant evidence that this has led to the destruction of diversified, moist habitats that used to support rich mosses (hydro-buffering agents) and plants including wintergreens, twinflowers, and grouse whorttleberry:



Figure 14: Cut Spruce



Figure 15: Dying Spruce associate and powerful hydro-buffering agent *Hylocomium splendens* can take a century or more to develop.



Figure 16: Dead Grouse whortleberry and dying Pipsissewa (a wintergreen) post logging operations and removal of Spruce canopy.



Figure 17: Juniper, an important ecological component, dead here after logging.

Above are from the Luhtasaari/Oatman (PBR) sale areas,

And from the Whitetail sale (BHRL), see below.



Figure 18: mixed stand with heavy spruce component already logged.



Figure 19: mixed stand with large spruce component already logged.



Figure 20: mixed stand, high biodiversity and biocomplexity already logged.



Figure 21: solo kazoo, left, and full symphony, right



Figure 22: same area 1 ½ years later

Spruce and mixed Spruce has been logged and blown over. Exactly how much Spruce is left on the Forest? Why log it now?

2. **Forest Service does not explain why there is a need to “increase the number of acres of Pine and Aspen forest-wide.”** It is questionable if Aspen even exists in significant quantities in the project area, especially since much has already been “treated” in the BHRL project.

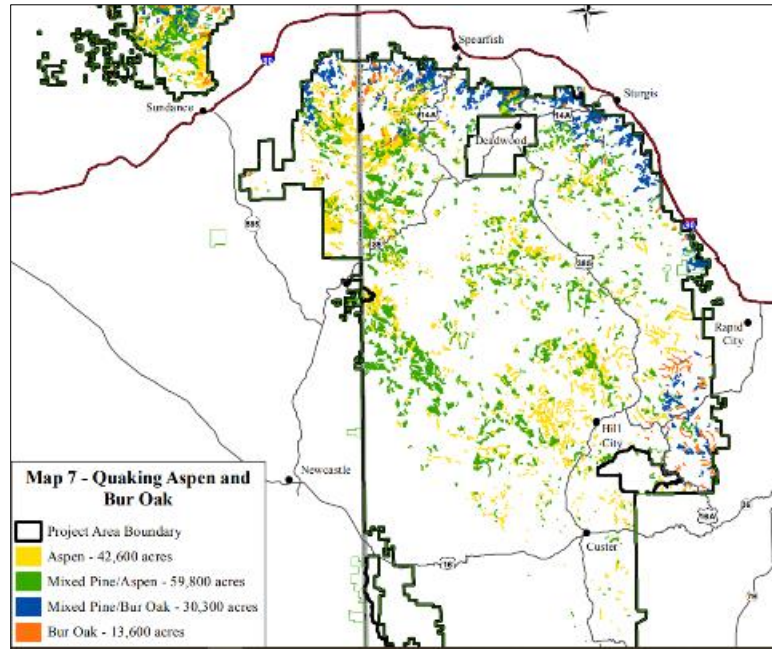


Figure 23: [103904_FSPLT3_3864483.pdf \(usda.gov\)](https://www.usda.gov/103904_FSPLT3_3864483.pdf)

BHRL map of Aspen and Oak:

notice proposed SPVM project area has few areas of mixed aspen and pine, and not a lot of pure aspen.

Much Aspen was addressed in BHRL

Generally Aspen is not created by “seeding.” How will Forest Service produce Aspen in the project area?

If BHNH truly wants to create more Aspen, there are many opportunities from the BHRL project where commercial timber has already been removed, but there has been no follow up to ensure removal of conifers as in this recently logged unit from the Merlin Timber Sale where the commercial product is gone, and young non-commercial spruce will overtake the Aspen again:



Figure 24: this “restored” aspen stand will not be so for long.

3. **Forest Service has offered no explanation or evidence of how clearcutting naturally pure spruce or spruce mixed with other species of trees and planting pine trees will make these areas “more resilient.”** More resilient how? Why? What is the rationale or evidence presented that this project will “increase overall forest resiliency and reduce undesirable fire behavior across the BHNH landscape?”

4. **There is no track record to indicate the funding for, or an ability to, conduct the proposed follow-up treatments (thinning of small trees, pile burning and prescribed burning, stocking surveys, or planting.)** Weed mitigation isn’t even mentioned and will certainly be a problem when native grasses and forbs that are used to shade are killed by the proposed “treatments.” These things have not been accomplished to a meaningful degree with other recent projects.

Please explain how activities like small tree thinning and prescribed burning will be funded, and given the low value of Spruce, what the chances are of these activities even being conducted.

Would you please provide some analysis of the cost of this proposed project compared to what could be accomplished in terms of small tree thinning and prescribed burning with the same amount of taxpayer dollars?

5. **Fire:** See [all.pdf \(fs.fed.us\)](#) Fire regimes of ponderosa pine communities in the Black Hills and surrounding areas 2017 USDA.

At times, Forest Service has expressed difficulty in getting prescribed fires in this area to light. The area of the Spruce vegetation management project area has not been prone to fire and bringing in wind a drying to the area will not make it better than it is.

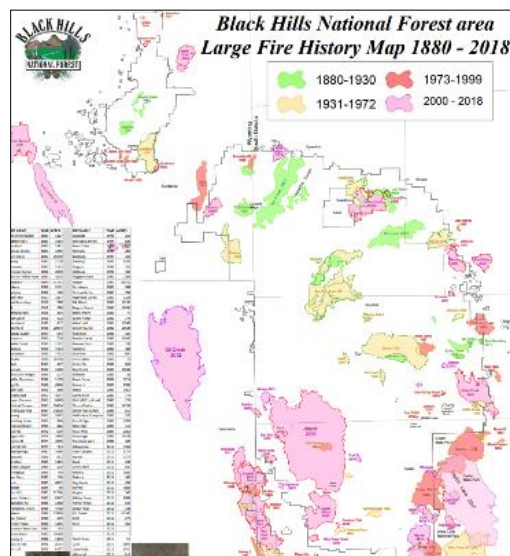


Figure 25: [fseprd706427.pdf \(usda.gov\)](#) Historic fires on the Black Hills

In the proposed SPVM project area, much has already been recently done in the way of Hazardous Fuels Reduction Treatments (2012-2015), Broadcast burning was authorized in BHRL, but not performed, and there is not a lot of WUI in the SPVM proposal area:

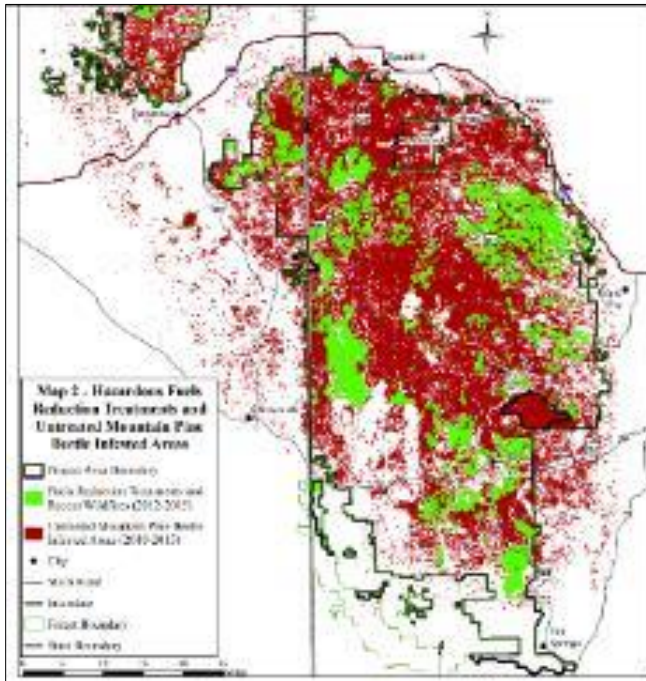


Figure 26: [103904_FSPLT3_3864478.pdf \(usda.gov\)](#)
 (BHRL) – Shows hazardous fuels treatments (in green) done 2012-2015

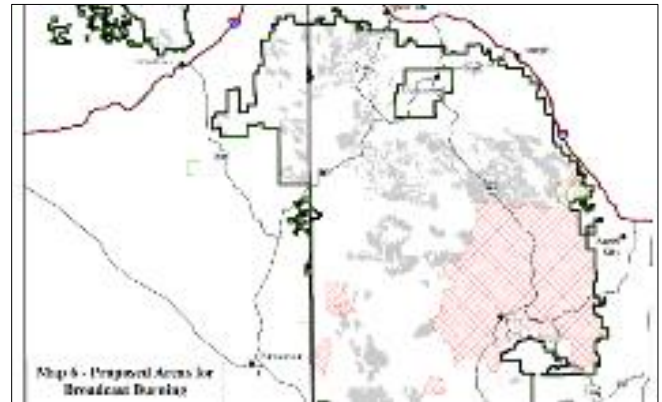


Figure 27: [103904_FSPLT3_3864482.pdf \(usda.gov\)](#)
 Broadcast Burning authorized by BHRL
 – None accomplished to date.

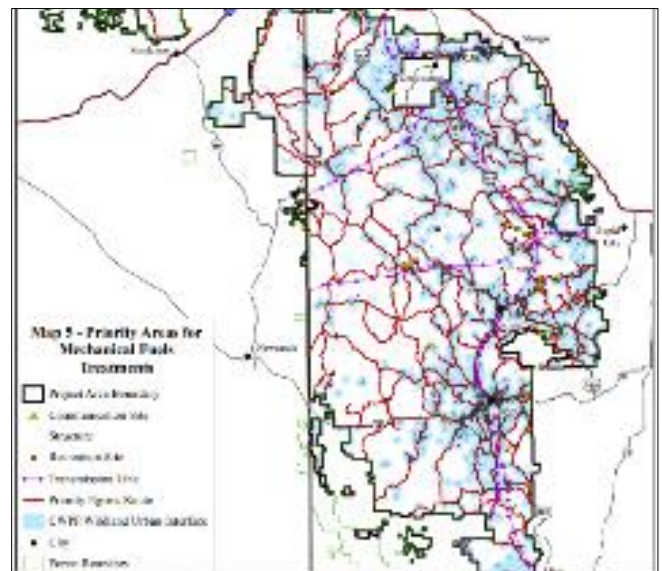


Figure 28: [103904_FSPLT3_3864481.pdf \(usda.gov\)](#): (BHRL) WUI: not a lot in the SPVM project area.

Most fires in the Black Hills area are started by humans, so investments should be made in educating humans. Compared to the alleged need to get into the SPVM project to alleviate fire risk, there is a far greater need to address the 200,000 + acres of small pines already released by recent excessive logging and the Mountain pine beetle epidemic. This is just one of the “lost opportunity costs” of the un-needed SPVM project. It is also an indicator of the likelihood of items other than logging getting done in the SPVM project.

6. Some of our most iconic, diverse, and resilient landscapes will be negatively affected by the proposed project. The Black Hills is the westernmost occurrence of White spruce. Black Hills spruce is a variant found only here; unique Black Hills Spruce plant communities exist nowhere else on the planet. They, by their nature, hold moisture. Of all ecotypes found on the Black Hills National

Forest, these are the most species-rich holding the greatest number of species proportionate to their area. These are higher elevations, north-facing slopes, and canyon bottoms. The notion that breaking up these areas and replanting them with pines will make them or the larger Forest more resilient is simply ridiculous. SPVM scoping notes that historical stands were not as extensive, using that as some sort of rationale for the project. So what? During the last Forest Planning process whereupon the current Forest Plan was developed, the Alternative that would move the Black Hills National Forest to historical conditions was rejected. Why? Because it wouldn't produce as much timber as the timber industry wanted! Please explain why the public should want to trade the project area acres with their current attributes of mature diversity and beauty for a pine tree farm someone might harvest in 120 years.

7. **Habitat Structural Stages and wildlife species in crisis:** The proposed SPVM project overlaps with the four year-old Black Hills Resilient Landscapes (BHRL) project which professes to restore objectives for Habitat Structural Stages (HSS) mostly via clearcuts. What will the SPVM project do to Habitat Structural Stage Objectives?

Not all mature trees on suitable lands are available for harvest because the current Forest Plan (FLRMP) limits logging to protect wildlife by meeting objectives for vegetation structural stage distributions. The FLRMP also provides protections for riparian areas and plant and wildlife habitat, etc.

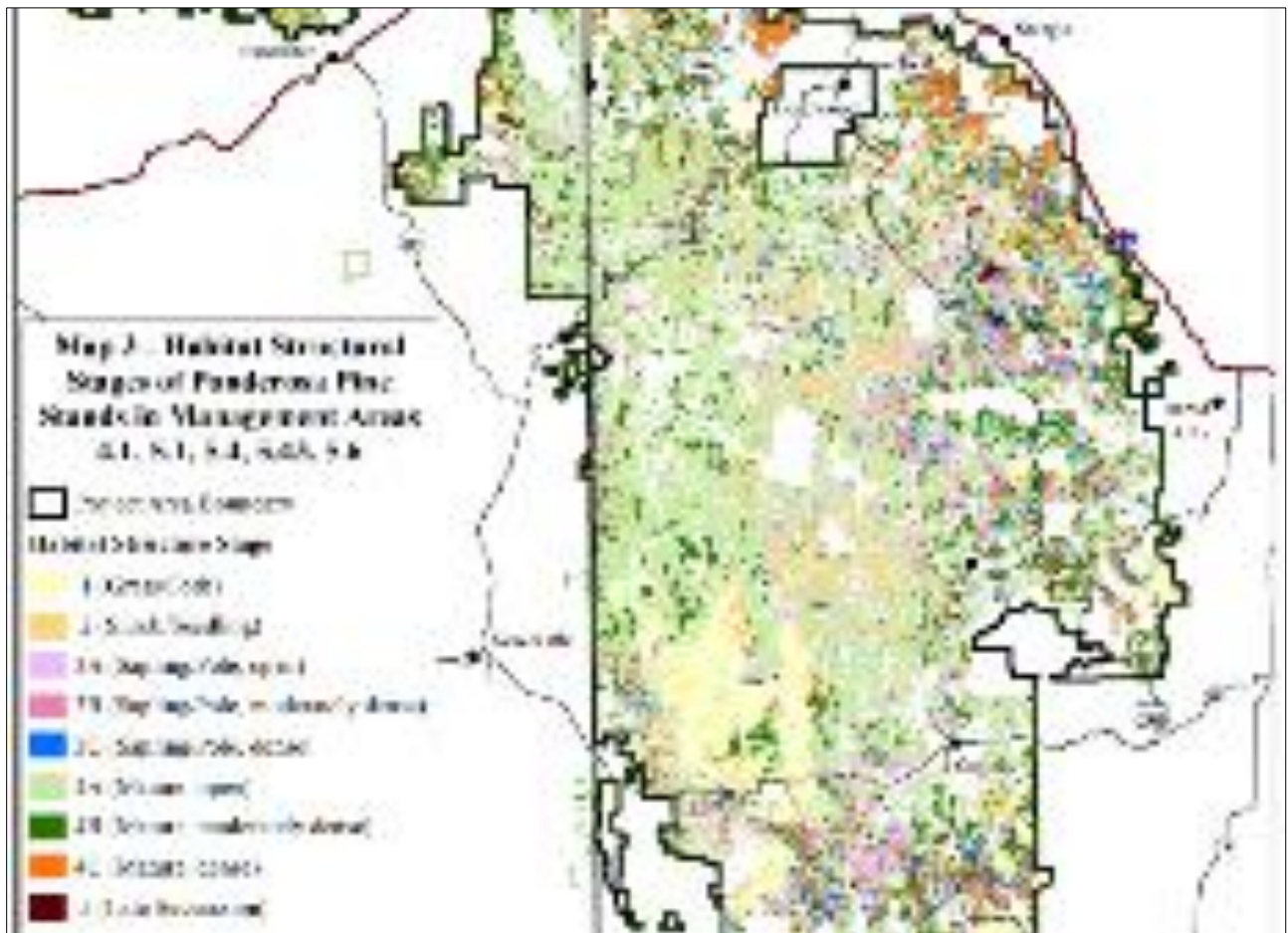


Figure 29: [103904_FSPLT3_3864479.pdf \(usda.gov\)](https://www.fs.fed.us/r2/foia/2016/103904_FSPLT3_3864479.pdf): (BHRL) Habitat Structural Stages c. 2016

The Forest Plan's **Habitat Structural Stage Objectives are designed to ensure species viability. BHNF FLRMP Goal 2: Provide for a variety of life through management of biologically diverse ecosystems.**

Objectives 4.1-203, 5.1-204, 5.4- 206, 5.43-204, and 5.6-204:

Meeting or moving towards Habitat Structural Stage Objectives has been an emphasized part of the FLRMP (remember the BHRL Project?) Indeed, the Forest Service has legal obligations to the public regarding the provision of habitat for wildlife in its pact with the American public.

The Forest Land Resource Management Plan and Forest Plan Habitat Structural Stage Objectives are rooted in a court settlement. The Black Hills National Forest 1997 Revised Land and Resource Management Plan (1997 Revised Forest Plan) was approved on June 24, 1997. In 1999, Deputy Chief James A. Furnish signed a decision addressing several appeals of the 1997 Revised Forest Plan affirming most appeal points; however, he found that additional evaluation of the sufficiency of the plan in providing for the diversity of plant and animal communities and species viability was needed and thus, the Phase II amendment provided management direction to adequately provide for species diversity and viability. The Phase II amendment fulfilled components of a Settlement Agreement for Civil Action No. 99-N-2173 (U.S. District Court for the District of Colorado, September 2000).

A significant Forest plan amendment, Phase II ensures that viable populations of native and desired non-native species are maintained by Goals and Objectives that protect habitat to sustain species viability and diversity. It also contains Standards and Guidelines for wildlife and plant species to ensure compliance with the requirements of the National Forest Management Act, its implementing regulations, and agency policy.

Given Forest Service Habitat Structural Stage data for the Planning Area and Forest Plan direction, how can the Forest Service adhere to its commitment to ensuring a viable Goshawk population while decreasing and targeting nesting habitat with the SPVM project?

We think the SPVM project has great potential to negatively impact important species of plants and wildlife: Ladies' slipper orchid, red and Flying squirrels, American marten, Northern goshawk, Black-backed and Three-toed woodpecker, Oreohelix snails and the Northern myotis just to name a few. Many species need these dense, continuous, and moist forests to survive.

Please disclose what the effects of the SPVM project will have on Habitat Structural Stages and the viability of species that currently depend on the habitat that exists in the project area at present.

8. Change, the current Forest Plan, Relativity, and the beginning of a new Forest Plan

The condition of the forest has changed markedly since the current Forest Plan was developed and forest cover on the Black Hills National Forest has been reduced significantly in the past 20 years including the Spruce project area. Recent Forest Service analysis concluded that 90% of the BHNF has been affected by fire, bugs and logging.

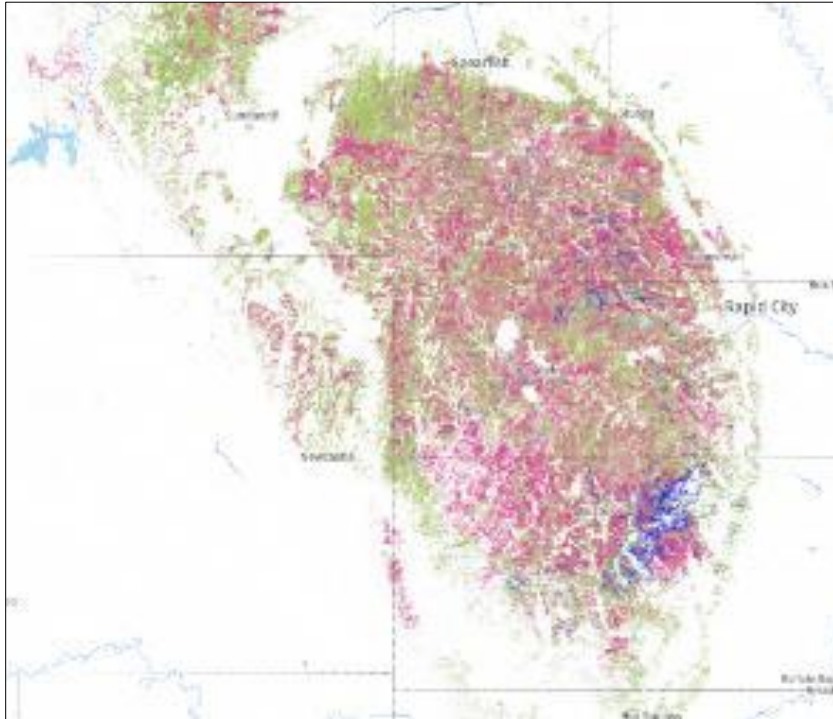


Figure 30: [Interactive World Forest Map & Tree Cover Change Data | GFW \(globalforestwatch.org\)](https://www.globalforestwatch.org/) Pink = forest cover loss between 2001 and 2020 and doesn't include the most recent logging.

It is questionable as to whether the current Forest Plan can be considered valid. Areas of the forest that are still dense are now relatively *more* fire and bug resistant than before because the forest is “broken up” from the past quarter century of fire, bugs, and logging; they are broken up by less dense coniferous, aspen, and unforested areas. To cut remaining dense forest, whether Spruce or Pine, does not do much to promote resilience to wildfire. In fact, it threatens other values on the forest and begins to promote a forest that is all the same – something that the current Forest Plan and the most recent Projects recognized as a problem. The SPVM project and others threaten to limit the possibilities that can be considered in the Forest Planning process at hand.

9. Goal 3 of the Forest Land Resource Management Plan, Regulatory Capture and Monitoring

The Black Hills National Forest is selling timber without regard to the laws, policy, and regulations guiding management of our National Forests. The SPVM Project appears to be a plan to continue the plunder of the Black Hills National Forest timber assets on behalf of an industrial/political capture of the regulatory agency called the United States Forest Service. This project has the potential to facilitate the crippling of local timber industries in the near and long-term future.

See [Regulatory capture - Wikipedia](https://en.wikipedia.org/wiki/Regulatory_capture): When regulatory capture occurs, a special interest is prioritized over the general interests of the public, leading to a net loss for society. The theory of client politics is related to that of rent-seeking and political failure; client politics "occurs when most or all of the benefits of a program go to some single, reasonably small interest (e.g., industry, profession,

or locality) but most or all of the costs will be borne by a large number of people (for example, all taxpayers)".

American physicist Frank Von Hippel has suggested that regulatory capture can be countered only by vigorous public scrutiny and Congressional oversight. Increased transparency of the agency may mitigate the effects of capture, according to Oxford trained economist Alexander Hamilton.

BHNF FLRMP Goal 3 states "Provide for sustained commodity uses in an environmentally acceptable manner." The Forest is currently in violation of the Multiple Use Sustained Yields clause of the National Forest Management Act. Will the Spruce Vegetation Management project contribute to the ongoing unsustainable logging on the Black Hills National Forest? This is the case with the past two large landscape-level projects (PBR and BHRL) despite the Objections of the Norbeck Society.

The BHNF must disclose to the public that the SPVM project will potentially contribute to an ongoing depletion trend in forest inventories and, counter to Goal 3 or the Forest Plan, increase the risk of losing more industry infrastructure and consequently render the Forest incapable of 'providing sustained commodity uses'. Please see 'A Scenario-Based Assessment to Inform Sustainable Ponderosa Pine Timber Harvest on the Black Hills National Forest' (RMRS-GTR-422), [GTR information flyer updated with reconciliation report links updated.pdf \(usda.gov\)](#), and the January 2021 Underhill report, Assessment of the National Forest Advisory Board Recommendation: [fseprd949571.pdf \(usda.gov\)](#)

Please disclose the volume of timber expected from this project including the anticipated volume per acre. We do anticipate that coming up with this number will be difficult given the NEPA-required site-specific analysis has not been done.

Please disclose the number of years you expect the logging portion of this project to last, i.e. what is the anticipated volume removal per year for this project.

Is this management being conducted in an environmentally acceptable manner? We don't think so. And with no monitoring, it's likely difficult for you to say it is.

From Russell T.; Battaglia, Mike A.; Jain, Theresa B. 2021. A scenario-based assessment to inform sustainable ponderosa pine timber harvest on the Black Hills National Forest. Gen. Tech. Rep. RMRS-GTR-422. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station: [A scenario-based assessment to inform sustainable ponderosa pine timber harvest on the Black Hills National Forest \(fs.fed.us\)](#) "...monitoring is crucial to obtain realized mortality and growth rates so harvest levels can be adjusted over time. History shows that allowing the forest to recover after large disturbances provides opportunities to adjust future harvest levels. Also, tending of young forests can promote recovery and produce sawtimber volume more quickly."

10. CO₂ Emissions, Climate Change, and Resiliency

Contrary to claims made in scoping documents, the SPVM project will produce substantial negative consequences of wind, drying, CO₂ emissions, and susceptibility of the treated areas to fire risk, insect outbreaks, weeds, and loss of adjacent forest to windfall and other cascading damages. SPVM will destabilize ecosystems that are currently the most intact on the forest and will impoverish

species diversity and complexity – both known as factors in resiliency. Spruce is doing well here. This variation of Spruce unique to the Black Hills has obviously made adaptations to succeed and all indications are that it is quite resilient. How does the SPVM project improve on that?

11. Roads on an over-roaded forest

Build no more. Reconstruct no more. Roads and skid trails from logging are already exacerbating the problem of too many recreational vehicles on the forest. The area is experiencing an increased influx of OHV use and the Forest Service does not have the resources to enforce rules and mitigate damage on and adjacent to the current roads. It is inappropriate to make more routes.

12. Water: the bulk of this project is at the ecologically important headwaters of multiple major drainages of the Black Hills.

The vast areas of spruce around major headwaters at high elevation and along canyon bottoms, streams and north facing slopes are critical for keeping entire hillsides, springs, and watercourses cool. These forests provide shade, and their complexes of nonvascular plants and rotten logs hold water and create humidity within the microenvironment. Typical buffers between bodies of water and clearcuts are likely insufficient and cutting on steep slopes or near springs or creeks would likely inflict warming of waters affecting aquatic life even farther down the water course.

13. Forest Service’s duty to address cumulative impacts

The SPVM project appears to overlap with these three projects also in scoping:

- Mystic District: Westside Project EA (comment deadline April 6)
- Northern Hills District: Chimera Vegetation Management project EA (comment deadline April 9)
- Theodore Restoration Project (comment deadline April 23)

It also overlaps with the ongoing Black Hills Resilient Landscapes project (BHRL)

Even if the Forest Service determines that it should or must apply the 2020 NEPA regulations, it must still analyze and disclose cumulative effects: the impacts of the proposal together with those of other reasonably foreseeable actions likely to cumulatively impact the environment in the area. While the 1978 NEPA regulations identified three types of impacts – direct, indirect, and cumulative – the revised 2020 regulations eliminate the terms “indirect” and “cumulative,” and explicitly repeal the definition of cumulative effects. 40 C.F.R. § 1508.1(g)(3) (2020). However, this attempt to eliminate the mandate that agencies analyze and disclose cumulative impacts contravenes Congressional intent, statutory language, previous CEQ guidance, and federal court decisions interpreting NEPA prior to the adoption of the agency’s 1978 regulations that the 2020 regulations purport to repeal.

14. Condition-based management isn’t working

The SPVM scoping letter states that “Treatments would occur on up to 25,000 acres. Proposed activities include regeneration harvests with reserve trees, overstory removal, group selection, machine piling, pile burning, and prescribed fire using a condition-based management approach.” However, NEPA requires the Forest Service to produce a spatially and temporally specific analysis because this is a project-level Decision. Analyzing and disclosing site-specific impacts is critical

because where (and when and how) activities occur on a landscape strongly determines the nature of the impact. As the Tenth Circuit Court of Appeals has explained, the actual “location of development greatly influences the likelihood and extent of habitat preservation. Disturbances on the same total surface area may produce wildly different impacts on plants and wildlife depending on the amount of contiguous habitat between them.” *New Mexico ex rel. Richardson*, 565 F.3d at 706.

Please disclose on the map (the “where”) what you plan to do and when.

Conclusion:

Actions on the forest must be done in service to the betterment of the land and in the best interest of the public. Founder of the Forest Service, Gifford Pinchot said that where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good of the greatest number in the long run.

The fact is that so-called “Forest Health,” as it has been shaped by logging industry is incapable of solving the major problems to which their existence has given rise: the resiliency problem and the wildfire problem. If the Forest Service is to achieve a truly resilient Black Hills National Forest, it will have to follow the science in earnest. It is going to take a lot of the actions that have not been done – small tree thinning and prescribed burning and a lot less logging.

The logging proposed in the SPVM proposal does nothing to further the basic mission of the Forest Service, and indeed, if carried through, will do much damage to so many aspects of this forest including significant negative impacts to wildlife and plant diversity and habitat, scenic integrity and tourism, recreation, spiritual experience, solace, and indeed even the timber industry.

This is especially critical at a time when a new Forest Plan is being developed. The Norbeck Society is in the process of compiling a table of special areas. How are we to interact with the Planning process when opportunities that exist now will be gone tomorrow – before we, the public, have a chance to collaborate in the planning process? There are multiple large projects being interjected at the last minute when many would say the current forest plan they are supposedly based on is invalid. We know that sales of timber far exceed what is sustainable. We see the future of this forest being crippled.

Overall, the Forest would be better off doing follow-up treatments in already logged areas and conserving the biodiversity of species and complexity of the areas in this proposed project. Please do not proceed with the Spruce Vegetation Management Project.

If you do wish to proceed, the scope and scale of this project, the issues of botany, wildlife, wetlands, etc. should require an EIS for adequate analysis. This project overlaps the BHRL project which is still in progress. It also overlaps Westside (Mystic), and Chimera (Northern Hills) which are in scoping. These constitute connected actions, and the cumulative effects are likely to be significant requiring an EIS. Full disclosure and accountability to the public must be ensured.

If proceeding, we suggest making the SPVM project considerably smaller, i.e., 2-3,000 acres in upland areas only (nothing near riparian areas, wetlands, fens), do not change cover types to pine, do not exceed 5-acre openings, no logging on slopes over 25%.