

[REDACTED]  
March 21, 2022

Jeff Tomac  
Supervisor  
Black Hills National Forest  
1019 N. 5<sup>th</sup>. St.  
Custer, SD 57730

RE: Spruce Vegetation Management Project

Dear Mr. Tomac:

Having lived in the Black Hills for over a quarter century, during which I have enjoyed many types of recreation within the Black Hills National Forest, I am writing to express my concerns about the Spruce Vegetation Management Project. In its current form, this project appears to be ill-advised. A full environmental impact statement (EIS) would document the potential negative impacts of the proposal.

There is no evidence that the forest needs to reduce the acres that are dominated by white spruce. Moreover, a monoculture of ponderosa pine is not a healthy or desirable outcome for the forest. Much of the area that is proposed for logging has already been heavily logged in recent years.

I would submit that the long-delayed updated forest plan should be completed first, since the condition of the Black Hills National Forest has been severely impacted by fires, pine beetles and previous logging. Since the white spruce is a sub-arctic species, we need to consider the impact that climate change has already had on the forest, and the fact that climate change impacts will only accelerate in the years to come.

Finally, it should be pointed out that the Black Hills National Forest is already substantially over-roaded. Many of the roads in the back-country were constructed specifically to facilitate logging operations. The wildlife and the people who enjoy the forest will benefit from the elimination of some of the surplus forest roads, not from the construction of additional miles of logging roads.

Thank you for your consideration in this matter.

Sincerely,

  
Jeremiah J. Davis