

March 25, 2022

Jeff Underhill  
1019 N 5th Street  
US Forest Service  
Black Hills National Forest  
Custer, SD 57730

RE: Spruce Vegetation Management Project - <https://www.fs.usda.gov/project/?project=61599>

Dear Mr. Jeff Underhill,

I am deeply concerned about the Spruce Vegetation Management project which proposes “treatments” of up to 30,000 acres of rare and precious Black Hills Spruce forests. Our most ancient and biologically diverse and complex Spruce forests would be “thinned,” or clearcut and replaced with theoretical pine plantations.

It is notable that the request for comments on the Spruce Vegetation Management (SPVM) project comes at the same time as public comment is invited for four more “vegetation management” projects - three of them overlapping the Spruce project. Additionally, it was recently announced that the public will be asked to comment on Forest Planning Assessments to be released for a 30-day comment period starting April 1.

Coinciding with the Spruce proposal, here are some of the other both absurd and tragic facts surrounding current circumstances of the management of the Black Hills National Forest:

- The Black Hills National Forest (BHNF) is being logged unsustainably, something Forest Service has been aware of since at least 2011.
- Much of the Black Hills National Forest is badly cut-over.
- BHNF has, at a minimum, 220,000 acres backlog of needed thinning of small trees – many “liberated” by recent logging and left to become fuels for wildfire and fodder for insect infestation.
- No Forest monitoring has been done since 2014, so we the public don’t know how any aspect of forest management is functioning.
- There’s also been no monitoring on the massive BHRL project (ROD 2018) which to date has included untold thousands of acres of unauthorized clearcuts and miles of unauthorized roads.
- A short time ago, the public was told structural stages and species viability were important, but now both concepts are actively ignored.
- BHNF is operating -sort of- via a 25-year-old Forest Plan.
- Forest Plan Revision is just beginning.

There is no valid purpose or need for this project:

How can you make the claims you have? What supports the idea of contributing to the economic well-being of the region when unsustainable logging cripples the possibility of a viable industry, the landscape is ruined for tourism and recreation, and the natural heritage of the people who live here is impoverished?

The character of a landscape helps define the self-image of the people who inhabit it and a sense of place that differentiates one region from other regions. It is the dynamic backdrop to people's lives. Any claim of positive social contributions is false.

How can you claim to reduce negative wildfire effects?

What supports the idea that you are reducing this risk when the massive issue of un-thinned crops of doghair across the Forest go almost untouched? What do you think will happen to tiny pines when a fire comes to the now rich and moist areas you plan to cut and doze to make room for a pine plantation?

What supports the expressed notion that the proposed project will produce structural diversity when with it, you are moving the forest towards less species diversity, and moving towards nearly 100% early seral stages and a monoculture of pine and invasives?

It is disingenuous for the Forest Service to make a proposal like this right at the beginning of forest planning. What if someone wanted to propose a special area for botany? What opportunities will be left for the future when the forest is being ruined by this kind of rudderless management? What are the lost opportunity costs?

The adaptation capability of this special variant of Spruce (Black Hills Spruce) to climate change is unknown – it is genetically different from White spruce to the north.

Like many plants, the Spruce shows an ability to create the conditions that in turn allow it to thrive; holding moisture by the nature of its shade and soils and the complex plant communities that inhabit it. For example, the *Usnea* lichens dangling from the spruce branches hold moisture and aid in an elevated humidity within the stand in contrast to the area outside it. The same with the stair-step and other spruce-associated mosses that can take a hundred years or more for the full development of a non-vascular, moisture capturing carpet. Under the shade of the spruce, a lower forb canopy shades again – the umbrella-like Sarsaparilla deepens the shade of the spruce. Fallen trees rot, shade, and hold water, providing habitat for countless species of lichens, mosses and fungi – all experts at holding moisture and also capable of suspending animation and going without. Spruce culture is rich with tiny shrubs and fruit-bearing plants like coralberry, twinflower, grouseberries, and strawberries to name a few. Small mammals and birds, arthropods and invertebrates find important habitat, and larger animals are hidden, protected and feed by these forests. Red Squirrels and flying squirrels, American Martens and birds like woodpeckers, kinglets, and others make their homes in spruce forests. In the Black Hills at this time, some of our northern Goshawks are dependent on spruce forests for their prey (like squirrels and woodpeckers) because of loss of so much pine habitat. So far, the Black Hills Spruce forests seems to be doing quite well - even vibrant- here in the Black Hills and they currently hold a wealth that we can't afford to lose.

This kind of aggressive and too often irreversible damage being done to Black Hills ecosystems in service to one special interest must end. Forest Service needs to recall who their real customer is – it's the People and the diverse components of our Black Hills National Forest. Leave the Spruce forests alone.

Thank you for the opportunity to comment.

Sincerely,  
Mary Zimmerman