



Neiman Timber Co., L.C.

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September 25, 2023

Matt Daily, Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730

Re: Spruce Management Project

Mr. Matt Daily:

Neiman Timber Company would like to thank you for the opportunity to review and comment on the Spruce Management Project. We provide the following suggestions, comments, and concerns regarding the proposed actions for this project.

Purpose and Need

The purpose and need for the project is to manage the current forest vegetation conditions to the desired forest vegetation conditions of the Black Hills Land and Resource Management Plan (Forest Plan). An objective in the Forest Plan is to manage 20,000 acres of spruce. Our current spruce stands a total of 59,000 acres. The proposal for treating 3,614 acres does not meet the purpose and need of the project.

Spruce Management

We are in favor of managing spruce stands to create a healthy resilient forest. We do not advocate for stand conversion within historic spruce stands. We also would not support a type conversion from spruce stands to meadows in riparian zones. Spruce provides shade for our few streams in the Black Hills. Neiman



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supports removing spruce where it has encroached in Pine and Aspen stands so long as the continued treatments are planned to ensure successful regeneration.

Furthermore, we encourage spruce stand treatments in Wildland Urban Interface areas to help mitigate severe wildfire risk. Spruce branching provides natural ladder fuels putting dense stands at higher risk.

Conclusion

We appreciate the work the USFS has accomplished on the project. We look forward to working with them on accomplishing the goals of the Spruce Management Project.

Sincerely,

Dustin Zander
Forester, Neiman Timber Company