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Organization:

Title:

Comments: Regarding U.S. Forest Service "Spruce Vegetation Management Project #61599,

I wish to submit the following comments:

1. I support sustainability logging in the historically multiple-use Black Hills National Forest. Factory-like clear cutting operations like the one along Limestone Road (FS 284) 7 miles northwest of Custer destroy the possibility of a forest's healthy regeneration for decades as huge tank-track machines cut and limb and stack many large trees an hour, ripping the shallow soils, sometime to bedrock. This method, pushed by lobbyists for the corporate timber industry, provides brief returns with dismal prospects for future generations.

Sustainable small-scale, locally-owned logging operations can manage a forest that will not only provide local jobs but also encourage regenerative management of harvesting and growth. Chain-saw cutting by trained foresters and transport of forest products with large-tired vehicles did short-term damage and allowed forests to recover quickly, especially if the large cone-producing grand-parent trees were saved.

Does Project #61599 support long-range economic sustainability or short-term return for slash-profit-leave operations?

2. I support tourism is bread and butter in our beautiful Black Hills plus hefty sales tax for the general fund. Imagine campers, mountain bikers, hikers, UTVers, snowmobilers and hunters, drawn to these forests for beauty and wildness, coming upon a slashed mess like that left by the project near Custer on Limestone Road. (Attached screen shot used with permission)

Some of the white spruce included in the "Spruce Vegetation Management Project" now under consideration by the Forest Service are easily 200-300 years old. They could fall to the slash- profit-leave logging operations under this plan. Most of the old-growth Ponderosa pine has already been cut in the Black Hills.

Shouldn't we spare these grand old spruce trees for today's tourists and our next generation of visitors while we still can?

3. I support management by science-backed forest experts not corporate logging industry lobbyists. Methods of selective harvest and prescribed burn maintain the natural tree and plant diversity that helps to slow wildfires and ensure the regeneration of a diverse forest. Our own Black Hills National Forest staff have told us so, based on major scientific assessments and studies.

Those experts <<https://gfp.sd.gov/rare-plants/>> inform us that white spruce stands, especially along moist stream beds, provide ecological protection for rare and endangered species of plants like Dwarf Scouring Rush, rare maidenhair ferns and sedges, Streamside Bluebells, several rare orchids, Northern Holly Fern, etc. An equally rare and endangered community of small animals and birds make spruce stands their homes.

4. Let's talk economics. Since the extensive logging of old-growth forests in the Black Hills Gold rush, pines have been the cash crop here. Today, jobs provided by sustainability logging competes with slash-profit-leave methods of 21st century industrial logging-good for short-term profits but bad for long-term logging and pine-forest management in our multi-use national forest.

Recent scientific studies which show we simply don't have as many mature trees to cut as in the past. Those trees have either been cut already, or they died in the Mountain Pine Bark Beetle epidemic. Furthermore, clear cutting (under the dubious label of overstory management) makes forests more vulnerable to wildfire. Massive wildfire poses our biggest economic risk to our property values, sustainable forestry and public safety.

Why are our local forest management, tourism, and science experts are being side-stepped?

Does the pressure for clear-cutting and so-called overstory operations (to make room for pine future forests) come from industrial logging companies who fund lobbyists and make political contributions?

To propose \$40 million for the U.S. F.S. "Spruce Vegetation Management Project #61599 is a misuse of our tax dollars because it endangers the wider benefits of a healthy, sustainable, scientifically-managed forest. The Thune-Barasso proposal offers short-term financial benefits for industrial logging and adds insult in excluding "expedited NEPA analysis and exempt(ion) from judicial review. I object to U.S. F.S. "Spruce Vegetation Management Project #61599.

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USFS Added for coding of attachments:

ATTACHMENT: Photo [Clearcut logging operations along Limestone Road (FS 2840) 7 miles northwest of Custer, SD on 3/3/2022]