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Organization:

Title:

Comments: Comments: Spruce Vegetation Management Project Proposal, Black Hills National Forest

As a cabin owner in the Hazelrodt Cabin Group of the Black Hills National Forest (BHNF), and as owner and taxpayer of three properties in Custer County, South Dakota, and as a family with multi-generational ties to Custer and the greater Black Hills area, I would like register the following objections to, and concerns with the subject proposal, as it stands. These are based in part on my observations of the logging operations surrounding my Hazelrodt cabin in the Black Hills National Forest during the last two years.

1) The Hazelrodt cabin owners in the BHNF, own their cabins, but lease the Forest Service lot on which they stand. The cabins all front on a Forest Service Road, Hazelrodt Picnic Area Road. It would appear from the definition of Wildland Urban Interface (WUI), footnote, p. 6 of the proposal, that perhaps $\frac{1}{2}$ mile surrounding those cabins and definitely 300 feet from Hazelrodt Picnic Area Road would qualify as a WUI, yet heavy logging, using skidders over the last year has occurred right up to the road and immediately off of the lease lot boundaries, which would appear to have disregard the page 6, "proposed treatments due to WUI concerns." We and other cabin owners also found logging slash on our leases, which we had to remove. Would this disregard also happen under the proposal?

2) In the BHNF surrounding the Custer area, due to the recent heavy, near clear-cutting, logging, there are probably hundreds of gigantic (30 feet high by 100-200 feet in diameter) unburned slash piles, in part due to the apparent "new normal" global warming and dryer climate. These can't possibly all be burned in one year, even in a wet or heavy-snow winter, in part because the Forest Service does not have the personnel staff to carry this out. These piles, which can last 80 years, then remain a tinder pile for forest fires due to lightning strikes on the upland forests where they are left.

3) Where trees are delimbed, the limbs are usually seen to be left in place, creating a forest floor littered with kindling.

4) My understanding is that spruce makes poor lumber, and is only used to make pulp. Why can't this slash be used to make pulp for paper or fiber-board, if that is the goal of logging the spruce trees? I recommend that the logging companies be required to do just that as part of their contract.

5) These heavy logging areas are accessed and logs removed by building new, or re-activating old, logging roads. These roads, coupled with the newly cleared forests by the logging, create new areas for snow-mobiling, ATV's and OHV activity, which continues to tear up the hillsides, and disrupt the habitat, breeding areas, and food supply of game and wildlife, as well as the flora of some of these sensitive streams and riparian areas. While I recognize that these activities fall under the umbrella of tourism, which is important to the Black Hills

economy, I suggest that this should be allowed in designated areas, and not be encouraged by heavy logging or near clear-cutting.

6) Developing access for heavy logging and its aftermath, removes ground cover which protects soil from erosion, and then allows soil washout across roads or into the many creeks in the BHNF, or in some cases, depending on the soil, even allows mudslides.

7) I also question the economics of the entire proposal. One of the other comments cites the following numbers. The main logging company in the Black Hills, pays on average \$30 per CCF. The National Forest Service spends on average \$55 [per CCF?] to administer the sale and other "administrated" aspects. So, to treat 25,000 acres as per the proposal would yield a net tax-payer loss of at least \$6.25 million, or as the other comment estimates, a \$40 million loss. I don't have access to better data to make such estimates, but the Forest Service does and should make that calculation (statistical risk and cost/benefit analysis) itself. Also, if statistics prove that in fact the "treatment" does result in a certain lower number of, and cost of, forest fires, thus saving money, that savings may possibly offset or even be greater than the administrative loss, which could make economic sense.

8) According to another comment, if one overlays the area of historic forest fires on the areas targeted for Spruce management for the purpose of decreasing fire risk, one finds there have been no fires in the proposed Spruce management area. This may be because these areas have not yet reached the climax forest stage of "over-mature spruce dominated stands," but it may also be that they grow most favorably in wetter, north facing and riparian areas.

9) It should be remembered that one of the attractions of the Black Hills for both full-time and summer residents, as well as visiting tourists, which all support the Black Hills economy, is the spectacular and unique beauty and recreational activities that the area offers, as well as the historical areas, all of which should be protected. The Black Hills are famous for its fishing and the riparian areas of spruce stands are especially beautiful and worthy of protection.

10) Other than that the logging industry seems to prefer pine trees for lumber, which are already covering more than about $\frac{34}{100}$ of the BHNF (see figure 1, p. 10 of proposal), is it really worth the effort and expense of attempting to replace spruce trees, on the other area ("spruce stands", black in figure 1) which is less than $\frac{14}{100}$ of the BHNF, with pine and aspen trees? Aren't there already enough pine trees to support logging, especially if the logging operator is required to recycle their slash for the pulp they apparently want from logging spruce trees? Could that money be better spent on other public projects?