Data Submitted (UTC 11): 3/25/2022 6:00:00 AM First name: Paul Last name: Horsted Organization: Title:

Comments: I'm against the Spruce Vegetation Management Project as currently proposed. Previously I commented on the terrible destruction on the landscape by the current ongoing logging project 7 miles northwest of Custer, and my fear that this is what we would see at all the spruce groves on your map.

I'd like to make two more points, with photos I've created myself as described below:

1. Old-growth spruce are likely among the last really old trees in the Black Hills. They are grand and lovely, and provide shelter for birds, animals, and the plants that grow below them. After 120 years of logging and mountain pine beetle infestations over the decades, there aren't many large, really old (200+ years) pines left. Note my documentation of an 1874 Custer Expedition photo site attached to this comment, from a site north of Pe' Sla (formerly Reynold's Prairie) marked for "treatment" on your map under the proposal (GPS coordinates provided upon request). Why should we cut these spruce trees (at right in the modern photo) where they've stood with their descendants since prior to 1874? They aren't hurting anything, and are a minimal fire threat along a waterway in a deep ravine, especially compared to the pine trees on the left (which were hit by the beetle in recent times, something the spruce obviously were not susceptible to). This is "resiliency"[hellip]resistance to fire by their location, and resistance to pests which kill pine trees.

2. Your proposal says you will reduce fire danger by cutting/thinning the spruce groves. This is such a fallacy, for several reasons, starting with the fact that they make up relatively small portion of the forest compared to pine. The fire/fuels problem in Black Hills National Forest right now is not these stands of spruce, but rather all the stands of dog-hair pine now growing rapidly in many of the places where the mountain pine beetle killed trees in the past 20 years.

In the second photo, I was standing at the original 1874 photo site, within an accuracy of 50 feet (GPS coordinates upon request). This was a dense pine forest 20 years ago when I visited. Mountain pine beetles came through, and now the young pines are creating a dense, unhealthy and fire-prone forest. Like the other photo pair I've shared, this is just happens to be a place we can document thanks to the 1874 photo, but it represents the same thing happening at hundreds of locations across the Black Hills, right now. Instead of cutting mature old-growth spruce, we should spend that money on thinning these dense young groves of pine. It's easier now while they are relatively small but there's an obvious fire danger coming as they grow larger. We can create the future forest of well-spaced trees, which will grow rapidly in that environment, and provide cover, scenic beauty as well as merchantable timber for the future.

It's my opinion that this current proposal is being pushed by politicians such as Sen. Thune and of course by the timber industry. It seems real goal is to harvest the last remaining large trees in the Hills, until they are gone. And then to probably blame the Forest Service for a lack of trees before shutting the last mill down. There's very little thought given to the future, but looking to the past we can see the trend, and now is the time to do something about it.

USFS Added for coding of attachments:

ATTACHMENT: Photo comparisons from 1874 and 2020 [July 28, 1874, Probably the horse used by photographer William H. Illingworth; July 28 2020: Pine trees killed by mountain pine beetle circa 2013. Spruce trees dating to before the Custer Expedition. Not my UTV tracks--I walked. Consider the damage logging equipment would cause here.; July 30, 1874: These ponderosa pine died after a low level fire a year or two earlier. the ground fire was hot enough to kill them but not burn them completely. Some of their neighbors survived. July 30, 2020: These pines (and many others like them not visible in this photo), formerly part of a dense area of mature trees were killed by mountain pine bark beetle...circa 2015. These young pines, around 5 years old, are growing rapidly but densely in the open space left after the mountain pine bark beetle epidemic passed here. Dense stands of "dog hair pine' like this one become a fire hazard as they grow and should be thinned allowing select trees to reach maturity.]