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Title: Natural Resources Planner

Comments: Dear Jeff,

The South Dakota Department of Agriculture and Natural Resources, Resource Conservation & Forestry Division (RCF) has completed its review of the Spruce Vegetation Management Scoping Letter and respectfully submits the following comments. Please note that our comments are made from a forest management perspective only.

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Page 5, paragraph 3: [ldquo]The results of all inventory methods indicate that the current level of white spruce is well above the forest plan objective to manage for 20,000 acres and that aspen is well below the forest plan objective to manage for 92,000 acres.[rdquo]

RCF supports proposed forest management activities aimed at removing spruce to promote aspen on sites where spruce has expanded outside of its preferred range, such as south-facing slopes and drier sites where pine is better suited. Forest management is an appropriate and effective tool to mimic natural disturbance and accomplish desired forest conditions.

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Page 6, paragraph 4: [ldquo]In pure spruce stands within the Wildland Urban Interface (WUI), regeneration silvicultural treatments will only be employed in areas that have a demonstrated need for treatment due to WUI concerns.[rdquo]

RCF supports the removal of spruce in WUI areas because spruce limbs persist all the way to the ground. This creates ladder fuels that carry ground fire into the crowns of trees and can send embers farther, increasing the risk to the surrounding developments.

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Page 6, paragraph 6: [ldquo]All ponderosa pine and aspen will be retained.[rdquo]

RCF recommends hardwood enhancement to increase forest diversity and improve wildlife habitat across the Black Hills. Spruce and pine should be removed in areas with established hardwood components to promote the forest plan objective for 92,000 acres of aspen stands. Areas where pine is not removed will continue to seed, and without further disturbance have the potential to out-compete the hardwood component in those stands.

Thank you for the opportunity to comment on this project. Please contact us at 605-394-2663 if you have any questions.

Sincerely,

Marcus Warnke

Natural Resources Planner

XC: Greg Josten, South Dakota State Forester

Bill Smith, RCF Division Director