

Data Submitted (UTC 11): 2/27/2022 6:07:31 PM

First name: Tanya

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Organization:

Title:

Comments: Dear Mr. Underhill,

I am writing to express my opposition to the proposed Spruce Vegetation Management Project proposed in the scoping package.

This is a totally unique ecosystem. The Northwestern Great Plains Highland White Spruce Woodland occurs only in two states in the United States and limited locations in Canada. The white spruce alluvial forest type is only known from the Black Hills of the United States. Global Conservation status of this forest is G2G2 - vulnerable and imperiled. These forests occur on a gradient with Ponderosa Pine and exist in suboptimal habitats for the pine. They are part of a mosaic of riparian plants that are critical to maintaining a healthy riparian ecosystem in the Black Hills.

Our spruce forests cool and protect our most unique and precious stream habitats in the Black Hills, with diverse species and regeneration of young trees requiring the conditions created by dense overstory trees. These trees protect our steepest slopes from erosion and our smallest streams from the sedimentation that will inevitably choke them if these slopes are logged. Loss of this shady, cool, clean habitat will negatively impact our fisheries resources through increased sedimentation and increased water temperatures downstream. This plan is a stream habitat disruption on a massive scale in the Black Hills, with no protection plan proposed.

In addition to contributing to healthy fisheries in the Black Hills, these unique landscapes also draw tourists to our region. They are part of some of the most beautiful landscapes of the Black Hills. In the form of dollars, tourism to our area significantly eclipses the community benefit from a few years of logging.

Logging of these forests will be difficult, costly, damaging, and of limited economic value. Wood quality will initially be high, but future harvests of spruce will hardly be worth the effort. New young spruce growing quickly without the benefit of a shady overstructure will produce low-quality wood for generations to come. This is a highly unsustainable single-harvest strategy.

How will logging take place on rocky 2:1 slopes without massive damage to the landscape? How will the Forest Service control erosion on these slopes? What is the stream and fisheries protection plan for this project? What is the tourism and viewshed implication of this plan?

I am not normally opposed to logging, particularly in Ponderosa Pine stands in the Black Hills. Ponderosa Pine is clearly much over-grown, but it is also a ubiquitous tree. It grows quickly to a harvestable size and generally grows in landscapes that recover fairly well from logging operations. The impact to habitats and the greater ecosystem with Ponderosa Pine removals is also fairly localized.

Spruce forests are another type altogether. The proposed plan will result in ecological damage that will be nothing short of catastrophic for these landscapes and will impact adjacent habitats far beyond the actual location of the proposed treatment.

Sincerely,

Tanya Olson

Custer, SD