

Data Submitted (UTC 11): 3/13/2022 9:50:28 PM

First name: Michael

Last name: Marek

Organization:

Title:

Comments: Our family has owned a residence in the Black Hills for almost 50 years. We are highly concerned about the proposed Spruce Vegetation Management Project #61599 and its proposed scope. We feel that the Forest Service should cancel this project.

1. Spruce trees tend to grow in shaded, north-slope areas or along creeks with more moisture. These pockets of spruce are not a significant fire hazard compared to pine trees, which grow in much drier locations across vast areas of the Black Hills. Indeed, the spruce trees likely stabilize their areas from erosion during heavy rains.

2. The proposed project has a high potential to harm plant and animal habitats. Spruce trees tend to shelter other flowers and plants (some of them quite rare, such as orchids), which need the moisture and shade provided by the spruce trees. An entire plant and animal community can thrive where spruce grow, adding variety and biodiversity to the predominant pine forest. The habitat fragmentation and loss of biodiversity that would likely result from this project would be harmful.

3. The term "overstory removal" appears in the documents for this plan as one of the proposed treatments, which apparently is Official-Speak for clearcut removal of spruce. Still, it is not yet clear where these radical microclimate changes would occur. Therefore, the actual impact and scope of the proposed logging is not clear.

4. Another irony is that spruce trees have little value as timber. Sawmills likely would not pay enough for these trees to cover the costs of this project, which would therefore need significant subsidization by taxpayers. We understand the current situation of the timber industry in the Black Hills, but back to the uranium mining proposals circa 1980, South Dakotans have consistently rejected environmental development programs that caused habitat and environmental degradation.

5. The proposal spruce removal could negatively impact the balance of multiple uses of the Black Hills National Forest, making it less appealing to hikers, hunters, anglers, and other casual family use of the forest.

6. A 2021 report by the National Forest Service itself, based on quantitative analysis, called for a 50% to 60% reduction in logging in the Black Hills National Forest.

7. We have heard that many local Forest Service staff members feel that this proposed project is unwise and that it has been forced on them by timber lobbyists and others in Washington.

For these reasons, we recommend canceling this project or, as an alternative, substantially scaling it back to limited small areas of obvious need.