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Comments: Thank you for the opportunity to comment on the Spruce Vegetation Management Project.

I question if the project will be able to meet or exceed the Land Resource Management Plan standards and guidelines. "Protection measures would be applied to minimize or eliminate potential adverse impacts from the proposed actions on other resources such as soils, aquatics, fisheries, wildlife, rare plants, cultural resources, and recreation."

Soils-Black Hills/White Spruce grow in the higher elevations, north sides and in cool canyon bottoms, especially riparian areas, where the soil is moist and mulch like. How will it be possible to remove spruce trees without causing erosion and the resulting silt and soil that will flow into the streambeds? Removing the spruce that are on the hillsides will result in erosion as well when gravity and rain combine. Then these trees will be machine piled with resulting ruts and damage from these heavy machines.

Water-The loosened soils will flow into the creeks that are currently bordered by spruce which currently provide a filter for water. Without the spruce, water flow will be reduced rather than increased. If there are heavy rainstorms, the loosed soil will flow down the steep hillsides and soil will be heaped where gravity and the motion of the water leave it. All of this will affect aquatics, fish habitat, and wildlife.

Rare plants and species-Spruce trees provide a unique ecosystem for these rare plants. Spearfish Canyon has the little dipper bird that goes under the water and swims. All may be affected by the changed water flow. But I appreciate that "botanical areas within the canyon will be studied...to identify what factors have led to the area's characteristic habitat." Doesn't this need to be done before spruce removal begins?

Cultural Resources-Our steep canyons are definitive of the Black Hills. Driving through the Hills, we see hillsides and rock embankments that have collapsed and crumbled. Occasionally a huge boulder will tumble down a cliff. Removing so many spruce, besides affecting the soil, will also affect the rock outcroppings and strata of the hillsides.

I believe beauty needs to be considered here as well. There is an aesthetic beauty to the Black Hills Spruce that is unique to our area. In the areas for planned removal of spruce, it appears that spruce trees won't have even a chance against the pine and aspen that are planned to replace them. Another concern is that the areas where pine and aspen will be introduced are not their natural growing habitat. Spruce grew there because it was their natural habitat.

Recreation- I recognize that components of this project include reducing fire danger, improving wildlife habitat and a long-term plan for future logging. However, if this plan is followed as written, a unique and defining aspect of the Black Hills, pure spruce and white spruce will be reduced by 60% in the proposed areas.

I believe that there are too many questions that need to be addressed to proceed with this project as currently planned. Thank you for the opportunity to comment on this project.