Data Submitted (UTC 11): 3/23/2022 1:46:37 AM First name: Linea Last name: Sundstrom Organization:

Title:

Comments: First, let's start with a fact: spruce stands in the Black Hills have been retreating and ponderosa pine stands increasing for the last 10,000 years. With the extremely accelerated climate change now underway, this natural succession process is speeding up. Why is this well documented pattern not mentioned in the scoping letter? (I can provide the studies if you lack them.) Second, what is the real reason for "treating" (i.e., destroying) the spruce stands? I am old and can remember when aspen was the target species for Black Hills National Forest "treatment" (reduction). Now aspen is good and spruce is bad? I fail to see how spruce moving into aspen habitat--if that's actually happening-is a problem for wildlife, water quality, or biodiversity. The problem with spruce taking over ponderosa habitat, for which I've seen no evidence, is an economic one: you can't sell the spruce trees and you can sell the ponderosas. Please don't try to couch that in terms of a healthy ecosystem. Monocropping is not healthy, and ponderosas will not thrive in the wetter, colder microhabitats favored by spruce. Trying to swap ponderosas for spruce stands sounds like an unnecessary, risky, and doomed experiment. A better option is proper management of the existing ponderosa stands: let them recover from recent overharvesting. Account for cyclical pine bark beetle outbreaks in your projections and adjust the amount of timber sold accordingly. Account for increased risk of wildfire because of climate change. I respectfully disagree that beetle outbreaks, fire risk, and droughts are "dynamic and unpredictable." Many, many studies predict a quantifiable increase in all three because of climate change---a term that appears nowhere in your documents. Killing off the spruce trees in not going to address the core management issue: climate change. Maybe the tree farm days are over, maybe not, but trying to squeeze out more board feet is not a creative or viable long-term option for the Black Hills forests. Instead of trying to increase your "commodity," recognize that these are natural ecosystems, not orchards. The spruce and mixed conifer stands give the Black Hills wonderful diversity: biodiversity and diversity of scenery. I have never, in my 66 years in the Black Hills, ever heard anyone describe the spruce stands as ugly, boring, or undesirable. Please don't sacrifice the specialness of the Black Hills to the timber industry.