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Comments: I am writing today in opposition of "Spruce Vegetation Management Project #61599".

In the 2021 report published by USDA Forest Service's Rocky Mountain Research Station scientists calls for a 50% to 60% reduction in timber production for the Black Hills National Forest over the next several decades. The report, entitled "A Scenario-Based Assessment to Inform Sustainable Ponderosa Pine Timber Harvest on the Black Hills National Forest," is a 68-page document based on forest census data taken over a two-year time frame and evaluates harvest level sustainability from a scientific standpoint.

Just months after this report came out the Black Hills National Forest is proposing "Spruce Vegetation Management Project #61599". This plan would "treat" spruce trees in stands indicated by the blue areas on the attached maps. Stated goals include reducing fire danger and, strangely, increasing the number of pine trees, which are already dominant in the Black Hills.

Ecologically, spruce trees tend to grow in shaded, north-slope areas or along creeks where there is more moisture. These somewhat isolated pockets of spruce aren't much of a fire hazard compared to pine trees which grow in much drier locations across vast areas of the Black Hills.

As a biologist, I know that spruce creates shelter for other flowers and plants (some of them quite rare, such as orchids) who value the moisture and shade beneath. An entire plant and animal community can thrive where spruce grow, adding variety to the predominant pine forest.

The term "overstory removal" appears in the documents for this plan as one of the proposed treatments. There would be clearcuts in at least some of the marked areas, yet none of these locations have been made available to the public yet.

The irony of this proposed cutting is that spruce trees have little value as timber. The sawmill won't pay enough for these trees to cover costs of this project. It is a shame to disrupt an entire beneficial ecosystem to create pulp.

One also must consider the recreation benefits to not carrying through with this biased proposal. Tourism is a multi-million-dollar industry in the Black Hills. The logging industry does not hold a candle to the money generated by the visiting public and the local jobs that are sustained.

There are many others who have commented on this proposal and have brought up some sound arguments and facts that this proposal should not be implemented. Again, I strongly urge you to deny such action.

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