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Comments: Comments regarding the Spruce Vegetation Management Project.
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Thank you for the opportunity to express my comments regarding the proposed Spruce Vegetation Management Project on the Black Hills National Forest.

You are proposing to do vegetation management in spruce and mixed conifer/aspen stands forest-wide in this project. According to your proposal, you are intending to conduct management activities on up to 25,000 of the approximate 49,000 acres located on suitable timberlands on the forest. This is a large portion of the existing spruce resource, over a large landscape.

I have the following ecological sustainability concerns. How do you propose to maintain the ecological sustainability of this relatively small, not well-distributed, forest ecosystem? I'm concerned that since this small ecosystem will become disturbed through road construction, changes in water flows, timing and abundance that related components of the ecosystem, plants, wildlife, and other organisms will be fragmented or isolated.

Will the treated and non-managed stands of spruce continue to be resilient, with enough acres to remain as functional habitats for species associated with the spruce, maintaining connectivity with similar stands/blocks of these spruce systems. What evidence do you have to show that these stands that are proposed for management need management? According to your referenced information, these habitat types haven't changed structural stages for decades. What evidence is there that management intervention is needed for ecological sustainability of this forest-wide resource?

The prospects of fragmenting already fragmented habitat for marten seems unavoidable, especially where WUI and marten habitat intersect. Please show how you will maintain sustainable habitat for the marten and other species dependent upon the spruce ecosystems.

Can a forest wide project dealing with a diverse set of ecological issues be handled through an Environmental Assessment? Seems like your analysis of project alternatives and analysis will need to show how managing these small stands within the forest wide matrix will be a major analysis task when showing how they currently are variable and how they will change over time.

How will climate change effect the functioning of these spruce stands. There seems to be a misunderstanding of the seral stages and functioning of these spruce stands. Especially where they still retain elements of earlier seral species such as aspen and ponderosa pine. The spruce in the Hills seems to persist well in the presence of fire in the pine. Will managing these stands and changing the water regimes in them make them more vulnerable to fire?

How has the forest monitored changes in this ecosystem during Forest Plan implementation? Are the changes in spruce abundance throughout the Hills related to chances in ruffed grouse populations and the changes in age class and structural diversity of aspen in the Hills? Is it unusual for the aspen stands that remain in the Hills are often in proximity to the spruce communities?

Are healthy stands of climax spruce really overmature? Especially when they exhibit diverse age classes within the stands.

What effect has the development of private lands within the boundaries had on the distribution of proposed stand treatments?

Is the assessment done to support the Forest Plan objective to manage for 20,000 acres of spruce still valid? Is that what your monitoring shows? What management practices have been improving the abundance and distribution of aspen and spruce in the Hills?

Thank you for the opportunity to comment on this project.