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Comments: Thank you for the opportunity to comment on Spruce Vegetation Management Project #61599.

I would like to preface my comments by saying that I have a forestry degree and support responsible, sustainable logging. I once was a proud employee of the Forest Service and continued to be a supporter until the last few years. I used to truly believe that we could trust the Forest Service to manage our national forests. When the Spearfish Canyon/Bismarck Lake land grab was underway, I spent many hours fighting that effort. I even went to Pierre to speak to the appropriations committee. I really believed in the Forest Service mission and trusted you would take good care of our forests.

After watching the BHNH continue to knowingly cut beyond a sustainable level over the last several years and ignore the recommendations of the GTR, I no longer trust you to take care of our forests. Something other than the law, as provided in the National Forest Management Act, is guiding your management today.

And now, you plan to use what I consider a totally misleading purpose and need to treat 30,000 acres of spruce with a variety of cutting, including an unnamed amount of regeneration cuts with treatments "larger than 40 acres expected." Why? Because it's so urgent that we reduce the amount of spruce that we have on the forest to the 20,000-acre level that you identified in the last forest plan - a level that obviously must have been out of line with the amount of spruce forest back in 1997. I have a hard time believing that the acreage of spruce would jump from 20,000 to 50,000 acres in just 25 years - thus requiring a 30,000 acres treatment proposal to be covered by a simple EA. It seems more likely that you had an unreliable estimate of the spruce acreage at that time. Also, the plan didn't say that 20,000 acres were the maximum. Why would it? Most healthy forests encourage biodiversity. They don't want to become a monoculture.

We already have a vast majority of our forest in ponderosa pine. (Granted most of it is early-stage ponderosa pine due to the extreme amount of overstory removal conducted recently.) Besides, spruce prefer a different type of site than ponderosa pine. You don't even have to be a forester to know that they prefer the shady, moister sites. So, even if you did remove all of this spruce, how are you going to convert it to ponderosa pine? I doubt the nursery can provide enough pine seedlings. We still haven't replanted the Jasper Fire area after all of these years. At 400 acres per year, it's going to take forever to replant the Jasper Fire Area, the McVey Project area, and all of these acres where you plan to replace the spruce with pine.

Furthermore, I spent most of my career in fire management and fail to see how converting a spruce forest to a ponderosa pine forest will reduce fire danger. Our spruce generally grow in the wetter, shadier areas. They aren't growing on the south-facing, drier slopes where one would expect stand-replacing fires to occur.

I hope that you will listen to the people of the area and hear how much they love the spruce forests. Please don't cut our spruce forests. If you decide to go ahead with this project and ignore the pleas of the people, I think you will lose the trust and support of those who believe in you. I no longer count myself in that number, but you do still have a lot of supporters. I think that if you pursue this project despite all of the protest, future foresters will have to work for decades to try to rebuild the trust that you are destroying.

Thank you for listening.

Doris Ann Mertz