

Re: Spruce Vegetation Management Project "Comments can be submitted through the electronic comment form located on the project webpage. Comments may also be submitted by means of written comment via the U.S. Postal Service to: Jeff Underhill, 1019 N. 5th Street, Custer, SD 57730. Comments should include: 1) your name and postal address, 2) project title (Spruce Vegetation Management), and 3) signature or other verification of identity upon request (36 CFR 218.25(a)(3))"

24 September 2023

The Project webpage has not been available for days and I've been unable to find way to submit my comments by computer. Thus the enclosed written comments. I'd be glad to submit electronically if someone provides a link that will allow me to do that. My ongoing effort to submit electronically has simply taken me round and round in a frustrating electronic circle with the message that this 'portal is unavailable'. I understand, in the rush of things, how easily this can happen.

David Miller
David Miller

(Reply not necessary as long as my comments get on record.)

Jeff Underhill
Black Hills National Forest
1019 N. 5th St.
Custer, SD 57730

Spruce Vegetation Management Comments
9-23-2023

I appreciate your reduction of the 25,000 (of 30,000) acres of the 2022 Spruce Project to 3,614 acres, but I strongly support the No Action Alternative. The revised Spruce Project is for the most part a microcosm of the larger project that preceded it. It once again poses a threat to our white spruce. The Project threatens to further fragment over 3600 acres of an already inexcusably fragmented national forest. The revised Spruce Project has no place in the Black Hills National Forest.

Where are these Spruce Projects coming from? The back log of needed thinning in the larger ponderosa forest has become a permanent feature of the national forest. The Agency has admitted that it is unable to manage off road vehicle travel and this in the face of population growth without precedent in Black Hills history. This Forest *is* unique among forests in Region 2, in the national system for that matter, and the much touted Case No. 1 Timber Sale of 1999 is but the start of the story. What happened in the Black Hills in the early years enabled the beginning of forest management and a legacy of timber conservation policy that has since drawn the admiration of people around the world. But much of what made sense c. 100 years ago no longer works. Do we understand what's at stake here?

The Spruce Project reflects the long term Forest Service tendency to treat the Forest more as a pine tree plantation and less as a national forest. Increasing numbers of Black Hills residents who have traditionally supported the Agency's management efforts are realizing it is time to speak out. Our white spruce *is legend* before it is commodity, and Agency failure to understand that explains much of the flood of opposition that the 2022 Project produced. White spruce is central to that sense of place that Black Hills residents call home. Large numbers of us saw the earlier Project as an assault on our spruce forests, and thanks to the fierce opposition of Black Hills residents bolstered by the informed professional comments of retired federal and state biologists,

conservation officers and landowners you made major (much appreciated) reductions in acres affected.

We've are crossing thresholds of no return, and the ongoing fragmentation of the Forest is now a central issue in this Forest. We have too few places left not yet crossed by a road or scarred by motorized vehicles. Large acreages with little or no standing saw timber and heavily impacted soils are now common place. And all of this in the midst of a boom in mining exploration and the continuing spread of housing development on our extensive patch work of private lands. We are facing urbanization driven by rapid population growth that has no precedents this side of the Gold Rush.

Even if the modified Spruce Project was good management (it's far from it) it is still a diversion of time and resources needed elsewhere. Your concern with the marginal increase in white spruce acreage over the past century is short sighted and short term. Climate change is trumping recent history. Our spruce somehow found safe harbor here in the Hills during the last ice age, but that safety is on the wane. If recent climate history is any guide, our white spruce is doomed in this Forest. How long will it take for rising temperatures to trigger the beginning of the end? We don't know, but it's reasonable to assume it won't be that long in historic time. The addition of a few thousand acres of spruce over the last century is the least of our worries. I strongly support the No Action Alternative.

David Miller
David Miller

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