Data Submitted (UTC 11): 3/25/2022 6:00:00 AM

First name: Blaine Last name: Cook Organization:

Title:

Comments: This proposed project is evidence of the continuing political push to manage the Black Hills. Since changing from large area analysis to forest wide condition approach like PBR and BHRL, this is continuing evidence of the chase for timber volume. The forest departed from even flow with the 2000-2003 wildfires. Departed further with the "bug march" 2000-2016. Then again further, with keeping volume offer at high levels for most of the last decade. Hence the chase for volume looking at spruce. The first spruce project recently proposed that fell silent should have been a clue. Spruce wood is a different composition & Damp; quality than pine. Processing spruce is different and not as good as pine. Industry has long been "not receptive" to spruce. Small amounts and mixing it with pine harvest works. There is an appraisal adjustment for it which results in lower advertised rates and bid rates. The true purpose of the project is timber production. As for resiliency, the forest will bounce back via regeneration. The spruce areas can burn as evidence of historical pictures. However, to say reducing fire behavior...well forest conditions do not measure up to the fire weather effects where wildfire blows through anything in sight as evidence of Jasper, Battle Creek, Elk Mt. and Myrtle wildfires. The chase for spruce might result in some stands harvested but at an area quantity that is significantly lower that proposed. Due to steep slopes, wet ground, high road construction costs and scenic integrity...many stands will fall off the table. Spruce does contribute to forest ecological diversity. Spruce is in the mix with addressing species viability which was the "driver" of the forest plan lawsuit of 1999. Forest monitoring keeps an eye on that metric. However, there is no forest monitoring to the public since year 2014. This project is an approach to show the RO & amp: WO & amp: politicians & amp: the public that the forest left no stone unturned to demonstrate volume is significantly lower. The handful of USFS analysis & reports since the 1997 forest plan all bear witness to that fact.