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Comments: Unfortunately, I cannot support this project as it is proposed for reasons that I will explain. I believe it could be beneficial to create some age class diversity in spruce but it should be at a much smaller scale.

Possibly two to three thousand acres would be fine. As proposed, this is a very large project to do with an EA. An EIS would probably be more appropriate for proper analysis.

This project will not provide site-specific information. There is no way that the public can adequately provide a response without this information. An informed public is empowered to correct the agency's mistakes, offer alternative means by which to accomplish the purpose and need of a project, provide additional relevant information, and persuade agencies that some impacts may simply be unacceptable. Project improvements are driven by public input, usually centering on concerns about site-specific impacts.

The justification for condition-based management is not adequate. Significant dynamic conditions do not currently exist in the project area. You should be able to complete your field work as part of your analysis and make a fully informed decision. You claim that the spruce is at a high risk of fire. There is not really a history on the Black Hills NF of large fires in spruce. There is a reason for this. Spruce tends to grow in drainages and north slopes that are more moist and cooler. For much of the project area, I believe that spruce would be at low to moderate risk of fire.

You are proposing to exceed the 40-acre limitation for clearcuts, without any justification. I oppose exceeding the limit without a clear justification and knowing where it will occur. A justification for the project is that the BHNF Forest Plan provides guidance for managing 20,000 acres of spruce. However, it does not limit spruce to 20,000 acres. Why must spruce be limited to 20,000 acres? Why the discrimination towards spruce? After the Mountain Pine Beetle epidemic, it seems like it would be wise to have more tree species diversity and less of a dominance of ponderosa pine.

The project calls for planting pine in spruce clearcuts and other areas. With the existing planting needs of the Chipmunk projects and Jasper Fire, you need to explain how there will be an adequate and timely seedling supply, after you cut these areas. Once they are cut, they are required to be regenerated within five years. Please explain from a practical matter, how you will accomplish this. What will the impacts to snails, marten, fens and wetlands be?