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Comments: The Project Scoping document doesn't provide enough referenced data and information to make a reasonable determination of potential project success as presented. The project seeks to modify forest conditions based on a desired forest type and not one that exists naturally in the Northern Hills ecosystem. A key objective is to, without justification, reduce fuel loads that contribute to wildfires. However, a USDA Fire Effects Information System (FEIS) report (2017) states that in high-elevation ponderosa pine and white spruce forests in the Black Hills and surrounding areas, "Limited fire history information was available for high-elevation ponderosa pine and white spruce forests; however, researchers surmised that this community burned less frequently than lowerelevation communities [19,62] because it is cooler and wetter." Further, the report states that the high-elevation ponderosa pine plant community represents a small fraction of the total forested area of this region.

It concerns me, and should you, that the that the Spruce Vegetation Management Project proposes to be conducted on 25,000 acres of spruce forest to reduce fire danger where no such danger has been documented. The scoping document presents an unrealistic approach proposed by someone who worked as a pre-sale forester with what appears to be a vested interest in providing funds to local business interests. It does not provide sufficient justification or detail for such a large funding request. One thing is abundantly clear: the project lacks scientific and environmental merit and is an attempt to openly provide significant earmark-type funding to support local forest products industry and businesses. Shame on Thune and Barasso for sponsoring a \$40M bill to fund a project that makes little environmental sense. A more reasonable and cost-effective approach would be to dedicate around 100 acres of spruce forest to conduct a demonstration project to assess the feasibility and potential benefits of such an approach before large tracts of spruce forests are destroyed.