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#### Why This Spruce Project?

The Spruce Scoping documents do not explain why you are proposing this Project. I read and reread the documents, and I'm puzzled. All this concern about an estimated 30,000 acres, 2.5 percent of the national forest, in which spruce has become dominant in the last 100 or so years? Why not welcome the increase? Our total of 50,000 acres takes up just over 4 percent of the national forest and the increase of the last 100 years not an indication of the future. Our spruce is in trouble. It will not survive the rising temperatures that appear to be in our future.

The Project reminds me of the Forest Service's Type Conversion program of the 1960s when this Agency was bulldozing aspen and spraying burr oak with herbicides. The Forest Service wanted more pine back then too, and it was willing to destroy aspen and oak get it. I realize your outlook on aspen has changed since then but mixed stands of pine and aspen will soon enough be mostly pine. I think the aspen is a side show in this Project. Any gain in aspen will probably be short term and will not come close to justifying the impacts on the spruce forest, on the Forest in general for that matter.

What do Black Hills National Forest people think about this? They live here and understand what to make of this and they care about this Forest. This Project has all the signs of a policy being forced on this Forest from higher authority.

The Project raises interesting questions. The Black Hills National Forest could not have come into existence without forest management and a lot of Black Hills people know this or seem to intuitively understand it. We are generally supportive of forest management but inherently suspicious of wilderness designations. Many people who know the history understand this. But we look at wildness differently than we do wilderness. We care very much about the natural character of the Forest and wildness is part of that character. I don't know that anyone can define it but you know it when you experience it. And we have too few of those enclaves of forest lands, those not yet crossed by a road, not yet scarred by motorized vehicles or have not yet had their the forest floor churned by heavy machines. We seem to care a lot about these places, and that caring has occasionally showed in the form of public protest.

Black Hills people put a stop to the bulldozing of aspen and chemical spraying of oak in the 1960s. Most of the people that stopped it were supporters of forest management, but the Agency crossed a line when it began destroying natural features of the Forest. We soon spoke up again when the Forest Service took a favorable attitude toward plans for a highway and tramway up Harney (now Black Elk) Peak along with a restaurant. That sparked some thousands of letters of opposition to the Forest Supervisor and a fairly quick end to those plans. Evidently the people who came up with the recent Spruce Plan do not read Forest history or, if they do they do not see the connections. Many if not most local people value our enclaves of wildness because they are what they are. The recent controversy over campground expansion in Custer State Park repeats the story.

I hope the Forest Service will take a close look at our time and place in Black Hills history. Forest fragmentation is now widespread and increasing, and the Spruce Plan represents a major increase in that fragmentation. We have the highest road density of any forest in Region 2, and we cannot accurately count much less manage the ongoing increase in ORVs in this Forest. Forest Service people have confirmed that. Careless automobile and

RV drivers are damaging streamside lands in East Spearfish Cr. above Hanna Campground; along Rhodes Fork of Rapid Creek upstream from Black Fox; along the Ward and Long Draw tributaries of East Spearfish Creek. We face population growth and development that has no precedent this side of White settlement. And in the midst of that you propose the Spruce Plan? What could Forest leadership be thinking? Black Hills people do generally support forest management. But there are limits, and the Spruce Project is pushing those limits.

White spruce is a tree of north forest and sub-arctic origins. It's at home in 50 below temperatures in the Northwest Territories, yet made its way to the Black Hills, an island forest in vast and arid plains that are today in no sense white spruce friendly. What's it doing here? You know the story better than I, but it's worth repeating. We think it arrived here in an Ice Age when the upper Missouri Valley was buried beneath ice masses thousands of feet thick and massive enough to create a cooler climate. It all makes sense when you stand in the Quiet dusk of the day on a north facing Black Hills slope. It is a storied tree and ours is a storied forest. We live in an era in which these stories will take on meaning to us our children and grandchildren like never before in our history. The kids are going to want to know what our position was on these trees in our time. White spruce is at home here and is also part of that sense of place that we call home. Leave it. It'll be gone too soon as it is.