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Comments: I appreciate that Black Hills NF considered and incorporated many of the comments from the scoping for the Spruce Vegetation Management Project. Revising the project from 30,000 acres to 3,000 acres signifies a major re-think. However, there was not adequate spruce monitoring from past to present to support the proposed 30,000 acre project and there is still inadequate spruce monitoring from past to present to support a 3,000 acre project. The questions "Why here? Why now?" remain. The statement made several times in the EA that the historic number of 15,000 acres of spruce communities should be a target for management today is entirely flawed, given climate change makes trying to achieve a past environmental status or condition undesirable and impossible. What new courses of adaptation will Black Hills spruce communities need in a new climate? Black Hills NF hasn't monitored spruce in the past and has made no indication that it will monitor into the future. The likelihood that blind actions like this Spruce Vegetation Management Project will help is extremely low.

As I reviewed the maps for areas proposed for spruce managements, I was surprised and alarmed to see many treatment areas in the vicinity of Black Fox Botanical Area (M.A. 3.1) and Swede Gulch low-density roaded area. Black Fox BA is in the immediate vicinity of the project - in the same watersheds as spruce treatment areas. Black Fox BA Management Area 3.1 is supposed to be managed with primary priority for the botanical (e.g. iron fen, spruce communities, Region 2 Sensitive Species and Black Hills NF Species of Local Concern) and other values (e.g. hydrology) for which it was designated. It is highly unlikely that a 100 ft buffer (as mentioned in the Spruce project) would be adequate to encompass enough area around any fen to ensure no impacts from machinery compaction, temporary road construction, increased noxious weeds, overstory removal, etc. resulting from this project.

The iron fen at Black Fox is one of the oldest intact hydrological and botanical features of the Black Hills but Black Hills NF really has no idea how its systems functions. Black Hills NF has depended in the past (with mixed success) on trying to avoid management in and around Black Fox BA to provide protection for the constant, cold water that supports the unique assemblage of plants, mosses, fungi, slime molds, and more in Black Fox fen. The spruce project is a change - it brings high disturbance management to the doorstep of Black Fox BA. Black Hills NF should not start playing with unknown impacts from significant disturbances from the spruce project to one of the crown jewels of Black Hills NF. There are 8 botanical areas on Black Hills NF which cumulatively make up less than 1% of the Forest. Each one is unique and precious in itself and as part of the Black Hills ecosystem. The Spruce Vegetation Management Project is in violation of Standards in the present Forest Plan for management of Botanical Areas. Even though it is not physically in any spruce treatment areas, Black Fox BA will be impacted and should be considered in analysis for indirect and cumulative impacts from the Spruce Vegetation Management Project.