



DEPARTMENT of AGRICULTURE and NATURAL RESOURCES

3305 WEST SOUTH STREET
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danr.sd.gov

October 10, 2025

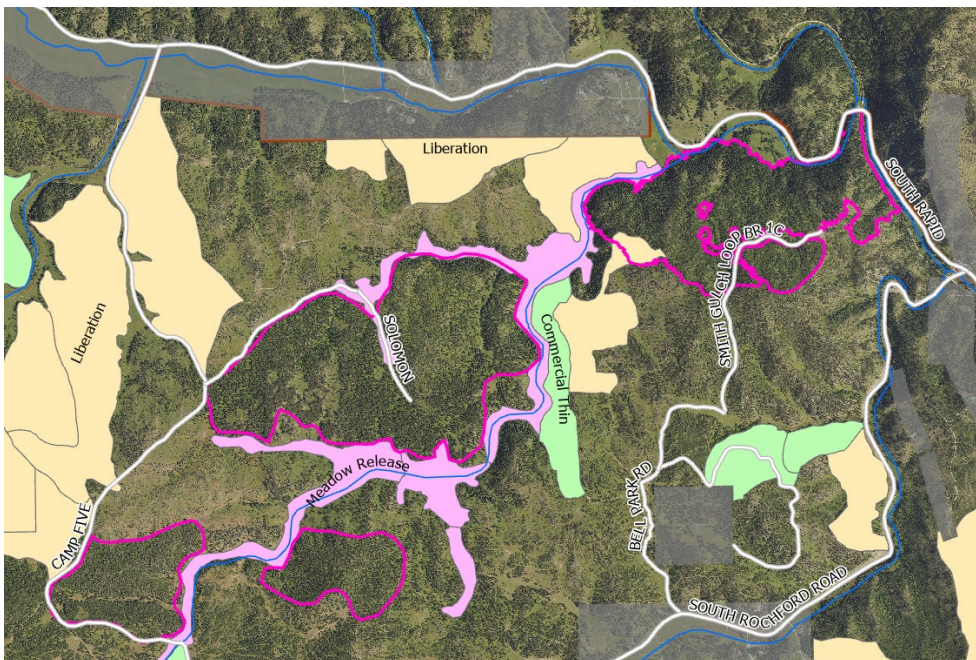
James Gubbels, Mystic District Ranger
8221 S. Mount Rushmore Rd.
Rapid City, SD 57702

RE: Comments on the Sawbuck Forest Management Project Environmental Assessment (EA)

Dear District Ranger Gubbels,

The South Dakota Department of Agriculture and Natural Resources (DANR) has reviewed the proposed Sawbuck Vegetation Management Project and respectfully submits the following comments for consideration.

Missed Opportunities: DANR believes the Forest Service is missing opportunities to expand commercial treatments into additional areas needing treatment. For example, the areas highlighted in pink below show dense stand characteristic but were not proposed for treatment. DANR recommends these areas be considered for treatment as part of this project.



Commercial Treatments: DANR recommends that additional single tree selection or variable density thinning be utilized throughout the proposed project area, especially in areas where the dominant overstory persisted through the mountain pine beetle (MPB) epidemic. Many of these MPB refugia areas have an already existing

diversity of age class and heterogeneity on the landscape making them ideal areas for single tree selection to maintain that stratification.

Group Selection: In the EA, it is not clear if this prescription is going to be applied to spruce stands, pine stands, or both. DANR recommends the prescription be applied to both spruce and pine stands. Prescriptions in spruce stands will create age class diversity. Prescriptions in pine stands will create heterogeneity in stand structure and age class diversity across the landscape.

Non-Commercial Treatments: Twelve to 14-foot spacing should primarily be used in areas where slash can be managed either through mastication, chipping, or piling and burning. Large continuous acres of 12 to 14-foot spaced trees with residual treatment slash should be minimized to reduce risk of tree loss due to fire.

Proposed Activities in Special Areas and Habitat: Treatments within the Research Natural Areas should include uneven-aged treatments (group selection, single tree selection, variable density thinning). These treatments will better maintain the existing heterogeneity in stand structure and age class diversity and better mimic the natural ecological processes and resulting patterns that normally predominate (patchy, non-uniform, and variable in size). Variable density thinning also aligns with Forest Plan Guideline 5611.

Treatments which occur in Botanical Areas should occur on frozen soils only, utilize hand crews and winch skidding as much as possible to minimize the negative impacts to the existing sensitive species and rare plant communities.

Legacy Pine/Late Successional Forest: DANR recommends that legacy pines be maintained in pine stands and in stands identified for liberation cuts. The EA states that legacy pine will be retained in mixed conifer stands receiving single tree selection treatments, however, DANR would like to see legacy pine retained throughout the project area. These trees add to structural diversity, wildlife habitat, and contributes to the aesthetic and social acceptance of forest management activities. Through appropriate spacing and placement, these trees can remain on landscape with minimal impact to the growing understory.

Riparian Area Treatments: DANR recommends that the management of grazing in riparian areas and the installation of livestock watering equipment be included to protect these areas. DANR supports the removal of pine from the proposed riparian treatment areas, though it is imperative to protect these sensitive coldwater fisheries. DANR does not want vegetation treatments to negatively impact water quality and habitat. The Black Hills National Forest should engage with DANR and the Department of Game, Fish and Parks when opportunities arise to conduct post-treatment riparian plantings.

Weed Control: DANR appreciates the existing measures in place to minimize the spread and establishment of noxious weed species, but we are concerned with the lack funding to adequately address post-treatment weed management. DANR recommends that the Forest Service explore all avenues to restore funding to weed suppression efforts.

DANR supports the purpose and need for the proposed work within this project as it focused on the future of the Black Hills National Forest while protecting the current resources and communities.

Sincerely,

Amanda Morrison

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