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October 17th, 2025

Mystic Ranger District Office,
Attn: Sawbuck Project,
8221 S. Mount Rushmore Rd.,
Rapid City, SD, 57702

Second Comment Letter for PHAS on Sawbuck Forest Management Project Draft Environmental Assessment

Project Page: <https://www.fs.usda.gov/r02/blackhills/projects/67518>

Dear Forest Service Staff People,

Thanks for allowing us the opportunity to comment.

STREAMS

We thank you for planning to work on stream/wetlands restoration and use beaver dam analogs and imitation log jams.

OLD GROWTH - Habitat Structural Stage 5 - SS5

Please discuss how much old growth is left on the Forest as a whole. Has the recent LIDAR studies provided any new knowledge with respect of old growth distribution in the Forest?

We don't think there is much SS 5 designated or provided in the Project. Table 8.1 indicates that in the 5.1 Management Area you have .3% in SS5 - that is the only SS5 on the project. Ironically you have no SS5 in the MA 3.7 or 3.1. Why is that?

Have you designated any stands to be protected going into the future to serve as future/replacement old growth? Your MA 3.7 is devoid of any old growth and has only 5.5% left in SS4C. We assume SS4C is the best resource for future old growth. Project wide you only have 1.1% in SS4C yet you are reducing that to .9 % - thus you are removing more SS4C from MA 5.1.

You seem to be leaving the stands in MA 2.2, MA 3.1 and 3.7 alone and are not reducing the stands in HSS 4 or HSS 3. But even in those areas you don't have lots of SS4c stands. You are not affecting the old growth (SS5) in them, as there is none.

In all management areas you are reducing SS4B and SS4C stands leaving us with 6.4% and .9% respectively. How are you going to create replacement old growth stands (SS5)?

You don't seem to be interested in complying with the objectives in the Forest Plan for percents of various HSS to be distributed across some Management Areas. How do you justify that?

STEEP SLOPE LOGGING

We are worried about environmental impacts from logging on steep slopes

STANDS OF SMALL TREES IN UNDERSTORY

We worry about the regrowth of small pines in the openings created by past logging and beetle kill. These are ladder fuels. We believe more logging will contribute to this issue.

ASPEN

We hope you work to increase acres of aspen, especially in the WUI.

DISPUTED SCIENCE

There is science indicating that the current forest management paradigm, dominated by mechanical thinning damages wildlife habitat, kills more trees than it prevents from being killed, increases carbon emissions, and makes fires spread faster, often toward towns, which can increase threats to public safety. Opening up of stands via logging, makes them hotter and more windy and thus more susceptible to fire. Dense stands are more moist, cooler and sheltered from wind and thus less likely to burn.

Here is a letter sent in the Old Growth Forest's DEIS, that John Muir Project wrote and PHAS signed on to: <https://johnmuirproject.org/wp-content/uploads/2024/09/Biden-MOG-DEIS-JMP-et-al.-comments-17Sept24RFS-compressed.pdf> This provides extensive references to scientific articles that dispute many of the theories the Forest Service uses to justify logging. It provides proof that large wildfires accrue across logged forests. We incorporate this letter by reference.

Thanks much,

A handwritten signature in black ink, appearing to read "Nancy Hilding". The signature is fluid and cursive, with a long, sweeping tail on the last letter.

Nancy Hilding
for self and Prairie Hills Audubon Society

