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Comments: To: Ranger Jim Gubbles

RE: Saw Buck EA

I have two primary themes in which I would like to comment on regarding the Sawbuck EA Scoping document:
Fire & Fuels and Water-Shed health.

Existing Conditions

Fire and Fuels

One sentence speaks to fire exclusion creating "dense uniform forests" and a subsequent sentence "the project area was heavily impacted by MPB mortality...". These two statements seem contradictory, how will the analysis unify these two concepts?

There is no mention of any Community Wildfire Protection Plan nor does it speak to how this project aligns with the Wildfire Crisis Strategy. Will the Pennington and Custer County CWPPs be incorporated into this project?

How does this project align with the Wildfire Crisis Strategy? Does this project align with any of the 250 Priority Firesheds? What is a POD? How can they be used for planning purposes?

With LiDAR data now available, has the data provided any surface fuels estimation? How will LiDAR data be incorporated into fuels analysis? How can/will this data be fed into modeling?

What fuel model(s) will be utilized for fire modeling outputs? Are fuel models within Landfire accurate? Will Landfire be used in fire modeling? How does FACTS affect Landfire disturbance and how does that affect fire modeling?

Wildlife

No mention is made of lack of Beaver population and their importance to watershed and riparian health though it is identified as a Management Indicator Species within the Phase 2 Amendment of the Forest Plan. This is especially troublesome as the 2023 Beaver Food Cache Survey found a mere 16 food caches within the 1,000 miles of surveyed streams. It is estimated that there are fewer than 100 animals within the Black Hills. What tools will be utilized to help identify and analyze where beaver should be and how beaver could re-occupy stream systems in the Black Hills?

Watersheds

Rapid Creek is identified as the only municipal watershed in the project area; this is a significant understatement. Rapid Creek Watershed is the only water source for Rapid City, Ellsworth, and adjoining communities; emphasis must be placed on water quality, quantity, and security. It is appreciated that it is stated that there is an absence of beaver on the landscape. Future analysis must expand on the importance and need of environmental services provided by beaver. How much water could be held above Pactola reservoir if only ¼ of streams had healthy beaver populations? Re-connecting incised streams to their riparian systems is of paramount importance for providing clean, cold, and abundant water.

Proposed Action

Conifer Thinning

*Activity fuels must be treated in such a way to reduce fire behavior and severity. Lop and scatter must be minimized in order to protect remaining over-story, soils, and water quality.

*Aspen Enhancement: smaller trees must be (not "may be") taken along with commercially valuable stems.

*No overstory removal should take place. Very few large trees remain within the project area due to mountain pine beetle mortality and extensive use of the treatment under the BHRL decision.

oOver-Story Removal should not count towards FP-FUELSALL target. Utilizing KeyPoint 6 in FACTS for this treatment is disingenuous at best.

*Even-age management was the method that brought us large beetle occurrence. Placing a greater emphasis on uneven-age management would provide for greater resiliency (both for fire and bugs) within our forested systems.

*How will activity fuels be treated in TSI projects? How will these fuels be treated near and adjacent to private

property? Will TSI take place on steeper slopes where mechanical treatments are not conducive? How will these activity fuels be treated?

Prescribe Fire

*How many acres over the entire project area are expected to be implemented? Annually?

*How many burn days can be expected annually? How many days a year are prescription parameters met within the project area?

*Will pre-treatments of surface and standing fuels be necessary prior to Rx fire implementation? How will scheduling of these pre-treatments maximize fire implementation?

*How will PODs be incorporated into the entirety of the project? Will commercial and non-commercial activities be designed and implemented to support prescribed fire?

*How will prescribed fire be utilized to protect Rapid Creek and its water supply for Rapid City?

*I fully support a collaborative effort with Tribes, BIA, and other land-owners in the area for cross-boundary implementation.

Riparian and Wetland Vegetation Improvements

*How will streams be identified for restoration and improvement?

*How many miles of both perennial and ephemeral streams will be targeted for

o Thinning or removal of encroaching conifers?

o Planting of native species including sedges and willows?

o BDA and/or PALS installation? How and/or who will install and maintain these installations?

*How will livestock be managed to protect aquatic systems and riparian plants?

*Please do engage partners for planning, installation, and maintenance of BDAs/PALS.

Overall, I would encourage a holistic approach to land management. This EA provides an opportunity to be a benchmark in looking at a Black Hills landscape as a functioning system. Plan for prescribed fire from the very outset. Plan and implement vegetation management with RxFire being the end-goal. By doing so, many of the constraints that have been historically experienced by RxFire practitioners will be reduced.

Lastly, I would also encourage engagement and collaboration with the South Dakota Game, Fish, and Parks, USFWS, and other collaborators in regards to Beaver re-introduction. Most of our riparian systems are so degraded they would not currently support beaver. However, with proper planning (which has in part been identified in the Proposed Action) Beaver would thrive and provide the environmental services that our changing climate requires. In doing so, water quality, quantity, and security may be achieved.

Thank you for providing the opportunity for me to comment on this EA.

Chris Stover