

Data Submitted (UTC 11): 3/19/2025 6:00:00 AM

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Organization:

Title:

Comments: My name is Mark T. Anderson, and I represent the Anderson Historic Preservation Assoc., the property that adjoins Tinton Rd for 1 mile at the Headwaters of Little Spearfish Creek. I am the retired Director of the US Geological Survey for South and North Dakota, teach at the SD School of Mines, operate a hydrology consulting business and a former Forest Hydrologist and Watershed Staff Officer for the Siskiyou National Forest in Oregon. Thank you for the opportunity to comment on this proposed project. I will offer support for the forest management objectives, but also have some questions, and several significant concerns.

Support

The harvest and thinning of Ponderosa Pine in the Black Hills to open up the overstory canopy is helpful to encourage growth of other species of trees (like aspen), shrubs, forbs and grasses, which gives the diversity mentioned in your objectives. An open canopy allows more precipitation to reach the forest floor. This has the added benefit of enhancing soil moisture and groundwater recharge. Also reduces the risk of stand destroying crown fires. Also, as we all know, Ponderosa Pine has the propensity for prolific regeneration which can create doghair stands that don't produce commercial timber and creates a monoculture. The objective to control the noxious weeds we fully support. Good to know you are in compliance with your most recent Forest Plan.

Questions

Some of your actions seem mutually exclusive as described in the project objectives--to encourage aspen regeneration and promote pine growth. It might be better to state in the intro this would happen on separate dedicated sites.

None of the objectives of the project explicitly mentioned wildlife enhancement as a priority to be considered. Elk prefer to calve in these dense stands of aspen for cover and later for winter forage.

Why wasn't the American Dipper noted in the Wildlife section? It is listed by the State GF&P as Threatened. We used to observe them regularly in our Madison springs but it is rare to see one today. The Bald Eagle is similarly not mentioned in the Wildlife section although not considered endangered now, they still grace the skies of our property especially in the winter. Together with the Great Blue Herons many fish in our ponds are sustaining birds through the winter because the ponds and waterways never freeze [mdash]the result of the constant flow of 45 F spring flow.

What does it mean that the Little Spearfish Watershed is "functioning at risk"?

Concerns

1. The project will undoubtedly produce more traffic on the Tinton Road. The lack of dust control is coating the meadow vegetation and adding sediment to Little Spearfish Creek. The use of Madison Limestone as a base for the Tinton Rd is a key contributor to dust and sedimentation problem of Little Spearfish Creek. Madison Limestone is readily available on the Limestone Plateau but is too soft and breaks down easily with cars, trucks and ATV traffic (See photo). The dust covers the buildings, infiltrates into the cabins and retards vegetative growth in our meadow. Minnekahta Limestone is much preferred as a road base.

To remedy, the road should be resurfaced. This problem would be solved, of course, by paving Tinton Rd, but at the same time, this just promulgates more traffic. A compromise solution would be to segment pave the road by

private land and the Headwaters of Little Spearfish Creek. At an absolute minimum, chip seal should be applied along the same sections.

1. There is reference to noxious weed control. Much attention is given to Leafy Spurge, but our primary concern is Canada Thistle (*Cirsium arvense*) and Wormwood (*Artemisia absinthium*). Wormwood is an invasive species originating from North Africa and it is spreading now through the Project area. It rapidly invades disturbed ground, which will require special precautions to be taken to further suppress its spread as the result of project ground disturbance. I would encourage aiding private landowners to assist with the spread of these noxious weeds.

2. An objective to enhance elk habitat and management is hardly mentioned. It would seem logical that given this area harbored the remnant elk herd in SD when numbers were very low many decades ago. This area is one of the best elk populations we have in SD although they move in and out of the area into Wyoming. Therefore, it is worth enhancing and protecting.

3. As I understand the map, hazard fuel reduction is planned for the steep slope bordering our western boundary, which extends for a mile. Although the concept of fuel reduction near private land is a worthy goal, this area presents some special concerns. First, the stands are mixed spruce and pine, and densely populated, but the hillslope is very steep especially on the north end of the property. How harvest or mulching could be done without extensive ground disturbance (skyline yarding?) is certainly an issue I would like to better understand and have input on. The dense stands now serve as refuge cover for elk and deer at least seasonally. So, this would be a consequential tradeoff to lose this cover habitat on these steep slopes.