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Comments: Jim Gubbels

District Ranger

Mystic Ranger District

Sawbuck Forest Management

8221 South Mount Rushmore Road

Rapid City, SD 57702

15 February 2025

Dear Ranger Gubbels,

Thank you for the opportunity to comment on the proposed Sawbuck Forest Management Project. We appreciate the links to comment, easy access to scoping materials, review of the environmental assessment, and the full consideration of objections if they arise.

As you know, the purpose of the Black Hills Group Sierra Club is to explore, enjoy, and protect the earth's wild places. Our members use the outdoors and the wild country of the Black Hills and Northern Great Plains for recreation and renewal. The knowledge that healthy environments and intact wild country exist, sustains us. Our members want to practice and promote the responsible use of Earth's ecosystems and resources. And to that end we work to educate and use grassroots activism to protect and restore the quality of the natural and human environment.

Regarding the Sawbuck Project, the Black Hills Group Sierra Club supports the project. We concur that the area is affected by deadfall, prior burns, and is a wildfire hazard. We support the multiple objectives as stated for "expand conifer growing space, improve forest health, restore stream and wetland habitats, enhance watersheds, and support wildlife by restoring native vegetation and promoting pine regeneration in the Jasper Fire burn scar through prescribed burning and targeted planting."

We understand that the revision of the Forest Plan is on hold for now, but we are glad to hear that the Sawbuck project will follow the existing plan and guidance of the Rocky Mountain Region, National Environmental Policy Act, the Memorandum of Understanding with with the Oceti Sakowin Great Sioux Nation Tribes, and the USDA Natural Resource Conservation Service (NRCS).

The Black Hills Group priorities may differ from that of the Mystic Ranger District, but here are our top issues:

Riparian and Wetland Vegetation Improvements
Stream and Wetland Restoration and Enhancement
Low impact actions (hand-thinning, and so forth) in Botanical Areas and Research Natural Areas
Environmental Protection Measures (p. 18)

Cooperation and use of Tribal Ecological Knowledge (TEK) (p. 14)
Fuels reduction including Prescribed burns, Aspen Enhancement and Meadow Restoration, and mechanical thinning.

We cannot endorse the commercial cutting at this time because certain interests have advocated what we believe (because of the rigorous, reviewed documentation of the Rocky Mountain Research Station) has been over-cutting for numerous years. Despite public participation, science, and hours of moderated conversation, this practice has continued.

We will also be watching closely for compliance with the National Environmental Policy Act, treaties and laws that protect archaeological, historical, protected and sacred sites. As a reminder on NEPA:

1. The Forest Service handbook in use is dated January 2020.

2. The Forest Service regulations to revise categorical exclusions were published in February 2020.

3. The proposed rules that were drafted in late 2020 were implemented ONLY for categorical exclusions. The other proposed regulations were never published nor implemented.

4. An Executive Order incorporating climate into natural resource decisions was issued in January 2021.

5. The CE regulations were subsequently revised by CEQ between 2021 and 2022 and are in effect.

6. The CEQ NEPA regs went into effect in July 2023, extending the timeline for federal agencies to update internal rules.

7. The Black Hills National Forest needs to follow what is on the books now, especially since litigation may occur in response to questionable executive orders.

We wish you a successful season of data collection and observation during 2025 and look forward to reviewing the environmental assessment.

Respectfully, Members of the Black Hills Group Executive Committee, South Dakota Sierra Club
Cassie Bockorney
Sam Clauson
Jay Davis
Alan & Jolie McCoy
Suzanne Martley