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Organization:
Title:
Comments: Attn: Sawbuck Forest Management Project
Mystic Ranger District
8221 South Hwy 16
Rapid City, SD 57702

19 February 2025

Dear Mr. Gubbels,

We are writing to provide public comment on the proposed Sawbuck Forest Management Project (ID 67518). As private timber and rangeland owners on 80 acres approximately 1 mile southwest of Deerfield Reservoir, my husband and I support the proposed project.

We have great concern over the amount of dead and downed fuels on Forest Service land surrounding our property and the associated catastrophic wildfire risk. We understand much of that fuel is pine killed in the last MPB epidemic, but there are also areas of very dense and not entirely healthy white spruce on the north-facing slopes coming down to the riparian meadow. We have been working on our own land in accordance with our Forest Stewardship Plan to thin pine and spruce to increase production and reduce wildfire risk, and to rejuvenate aspen for wildlife habitat, and we look forward to similar measures on the forest. The density of downed fuels on the forest also reduces the amount of available forage for wildlife and permitted grazing.

We note the recognition of the Project area as the headwaters of the Rapid Creek Watershed. One of the reasons we purchased our land was the opportunity to protect and rejuvenate a headwaters stream (Nichols Creek) of this watershed we depend on. In the past three years, as we have worked to exclude cattle from the creek, we have seen the re-emergence of riparian species that were undocumented or struggling in previous years (iNaturalist username "flying_tomato"), as well as identifying a possible fen area stretching across the boundary between our land and FS.

After consultation with TNC last fall, we hope to start a BDA/PALS project in the riparian meadow on our land this summer to increase water storage, provide protection from wildfire, encourage regeneration of aspen and willow, and remediate incision of the creek from decades (a century?) of unmanaged grazing following the removal of beaver from the area. We would be happy to discuss ways we can coordinate our work with the Mystic Ranger District within our small part of the Project area.

One serious concern that has emerged out of monthly water sampling I conduct on Nichols Creek as a SD DANR Volunteer Water Quality Monitor is that, despite the exclusion of cattle from the riparian area on our property, we have seen E. coli levels spike during the last two summers coincident with grazing season on the Forest. [https://apps.sd.gov/NR92WQMAP Station ID: MNNC] We hope that use of low-tech process-based restoration techniques (PALS/BDAs) will also help to slow water down and capture some of that nutrient before it flows downstream to S. Fork Castle Creek and Deerfield Reservoir.

Additionally, as we understand is true of many other small perennial streams in the Sawbuck Project area, the mile or so of Nichols Creek upstream from us on the Forest is in dire need of restoration, being a quagmire of live and dead/downed spruce, but restoration will also need to include protection of the waterway from the dozens of cattle who congregate in the stream bed during the heat of summer, causing E. coli levels to spike. Please strongly consider incorporating alternate water sources for grazing lessees.

Please note that we do not wish to terminate grazing leases or harm cattle producers (we provide some limited grazing for the adjoining permittee as well as to our private landowner neighbor), but we need additional protections for our waterways, and will continue to seek ways to mitigate negative impacts on our own land.

Lastly, we urge extreme caution with the use of prescribed fire in the area surrounding our land, and encourage a close discussion (when and if planning commences) about roads, trails, and potential fire break areas that we could provide access to on our land should they be needed as a backup. A cell tower critical for emergency service in the Deerfield area is located just a few hundred yards across the property boundary on our neighbor's place. While we recognize prescribed fire as an important tool for forest management, the sheer amount of fuels on the Forest surrounding us is cause for concern (and even more so for the neighboring landowner, whose home is there). Mastication and/or mechanical piling/chipping may be a more appropriate tool in these very dense fuel-choked areas.

Thank you again for the opportunity to comment on this important project. We sincerely hope that the Forest Service continues to have the resources and manpower to carry it through. Please feel free to contact us if you have any questions.

Respectfully,
Rebecca M. Terk & Bruce H. Ellison