



THE WILDLIFE SOCIETY

South Dakota Chapter

523 E Capitol Ave.

Pierre, SD 57501

Sherri Schwenke
Hell Canyon District Ranger
Black Hills National Forest
Att: Nancy Bayne
330 Mount Rushmore Road
Custer SD 57730
(605) 673-4853 FAX (655) 673-5461

April 16, 2014

Subject: Elk Mountain Reforestation
comments-rocky-mountain-black-hills-hell-canyon@fs.fed.us

Dear Ms. Schwenke:

The South Dakota Chapter of The Wildlife Society (SDTWS) responds to the Hell Canyon proposal to replant pine on approximately 2,000 acres of Elk Mountain. Our organization has an interest in this project and we appreciate the opportunity to comment. We ask that the Black Hills National Forest continue to keep us informed of this project's progress.

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our South Dakota Chapter achieves this mission in part by evaluating the principals involved in proposed public actions that affect wildlife and habitats. Our Chapter goals and objectives are more clearly outlined at: <http://sdwildlife.org/>

We believe this project is ill-advised because of the impacts it would have on the bighorn sheep currently inhabiting the area. At the minimum, this project should not be categorically excluded because of the negative impacts to a Forest Service Sensitive Species and a full environmental study should be conducted for the project. This will provide opportunities for all concerned parties to provide input and ensure that management decisions made by the Forest Service will not negatively affect the sheep in the area.

Bighorn sheep occur within the Black Hills and Badlands National Park. These two populations are isolated. Herds in the Black Hills include the greater Rapid City/Hill City area, Custer State Park and Elk Mountain. Our Chapter has been involved and supports bighorn sheep relocation and management throughout South Dakota.

The bighorn sheep population on Elk Mountain became established after initial introduction fifteen years ago in Hell Canyon (Dakota Cement Properties). The

bighorn herd moved to the Elk Mountain complex within the first few months. Elk Mountain is quality bighorn sheep habitat because of the remoteness and the open habitat types improved by the Elk Mountain Fire Complex from 2001 - 2011. Elk Mountain is yearlong range for bighorn sheep and this is a shared herd with Wyoming. Quality bighorn sheep habitat on this mountain is comprised of large, continuous grassland habitats, few trees, water, ideal escape routes, and sufficient horizontal visibility to detect predators and humans. Elk Mountain is one of the only bighorn sheep management areas that has not experienced issues with disease and die-offs and has become a viable bighorn sheep management area in the Black Hills ecoregion. This herd not only provides viewable and photographic opportunities for the public, but at the present time, is one of two bighorn sheep populations in the Black Hills that can sustain limited hunting opportunity for rams.

Public access for hunting occurs on the Black Hills National Forest and the Department of Game Fish and Parks (SDGF&P) leases hunting access from private landowners adjacent to Elk Mountain. The "Walk-in Area" hunter access program provides hunting opportunity for bighorn sheep and other big game species. Elk Mountain and the surrounding areas are extremely important for hunting opportunity on both public and private land and these values should be reflected in assessments for this project.

BHNF has a management direction to restock 150 seedlings/acres of ponderosa pine in the Elk Mountain burned area with the goal to produce a merchantable timber stand. It is questionable that this area has ever produced merchantable timber or if it has the capability to do so. Replanting will diminish the habitat type that bighorn sheep need for yearlong range conditions, health and viability. Since bighorn sheep are classified as a sensitive species for the Forest Service (FS) in Region 2, this management direction will have a negative impact on bighorn sheep as timbered habitats are not compatible with bighorn sheep summer, winter or year-long range selection.

A Categorical Exclusion does not provide adequate information on the environmental impacts of the proposal to replant pine on Elk Mountain because of the bighorn sheep classification as a sensitive species. There is a need for the Forest Service and the States of South Dakota and Wyoming to sustain long-term reproducing populations. If this herd is negatively impacted by the proposed project we believe that there could be cumulative impacts to all bighorn populations in the Black Hills. The vegetation conversion due to restocking ponderosa pine would have several possible outcomes which we request be evaluated: significant reduction of available open grasslands and forage, forced movements of bighorn sheep out of this portion of currently suitable habitat, increase the likelihood of depredation on adjacent private lands, increase the chances of contacting domestic sheep and goats on private land, and create possible competition for available forage and browse for all grazing animals (wild and domestic) on the BHNF. We believe these cascading events would initiate a cause and effect relationship between the proposed action and the long term viability of bighorn sheep which is not to the benefit of the animals, the public and the BHNF.

We request that BHNF assess these potential consequences and outline for public review, mitigation practices to avoid harming bighorn sheep and their preferred open habitat. At present, the Black Hills proper provides very limited quality bighorn sheep habitats with the exception of some treeless steep terrain and those areas

that have been affected by fire (wildfire or prescribed burns). The project area is selected by bighorn sheep because it fulfills life cycle requirements. We believe the BHNF has an obligation to provide habitat for this population and request that the project address the BHNF responsibility for bighorn sheep.

This area of the Black Hills is extremely dry, timber growth is slow, and does not produce the quality merchantable timber when compared to other areas that have a higher moisture regime, deeper soils and longer fire intervals. We ask that BHNF explain how it became feasible to classify the northern part of Elk Mountain as an area required to produce marketable timber. The BHNF should analyze and consider the added costs of planting pine and associated treatments to reforest this area.

BHNF project evaluation should look at options to reclassify these 2,056 acres into a category that does not require timber planting to meet federal law (National Forest Management Act). BHNF should also consider assigning a new Management Area designation for open habitat with a specific bighorn sheep emphasis. Highway 16 divides Elk Mountain from other FS property to the north. It seems odd that the 2,000+ acres on the north end of Elk Mountain are MA 5.1, but north of highway 16, it is 5.4 for big game winter range. This appears to be incongruous considering that big game has historically and will continue to occupy the Southern Hills in the winter.

Our Chapter is under the impression that the BHNF management plan is a dynamic document that can be changed when resource conditions no longer meet the plan's original assessments. We believe that this project inadvertently brought to the public's attention the conflicting federal resource management directions on the north end of Elk Mountain. We have identified several needs for project assessment and believe a change to the plan due to large-scale changes in vegetation and new bighorn sheep use is needed.

Lastly, the Wyoming office of the Bureau of Land Management (BLM) administers land directly west of the project area and adjacent to that portion of Elk Mountain managed by BHNF. BLM is actively involved with the Wyoming Game and Fish Department to manage for bighorn sheep. The SD Department of Game, Fish and Parks is also involved. We suggest that if BHNF is not already part of this joint-effort, that a unified, working relationship be established for the benefit of bighorn sheep.

Our preference is that BHNF not implement tree stocking or seeding. We urge BHNF to use every available directive and law to avoid irretrievable, detrimental impacts to a stable population of bighorn sheep on Elk Mountain.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Norton', with a long horizontal line extending to the right.

Mark Norton, President
South Dakota Chapter of The Wildlife Society
Mark.Norton@state.sd.us
605-773-3096