



THE WILDLIFE SOCIETY

South Dakota Chapter

1112 Westwood Drive

Pierre, SD 57501

October 4, 2013

Nebraska National Forest and Grasslands
Attn: Mathias Wallace
125 North Main Street
Chadron, NE 69337

Subject: Outfitter-Guide Needs Assessment
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The South Dakota Chapter of The Wildlife Society (SDTWS) responds to the Nebraska National Forests outreach for public input on a Needs Assessment for Outfitting and Guiding. These types of special uses have important implications from both an outdoor educational perspective, as well as potential environmental impacts that require much more detailed analysis. Outfitting and guiding includes numerous outdoor adventures and services, more than we can specifically address at this time. We ask that the NNF continue to keep us informed of additional comment opportunities.

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. The 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/>

Our highlights include:

- Retaining the current primitive, unique and desired conditions of Management Areas 1.2 Recommended for Wilderness, 1.31 Nonmotorized Backcountry Recreation, 2.2 Research Natural Areas, 3.51 Bighorn Sheep Habitat, 3.63 Black-Footed Ferret Reintroduction Habitat, and 3.64 Special Plant and Wildlife Habitat.
- Commercialization and privatization of wildlife and fisheries resources.
- NNF ability to monitor, enforce and adequately assess impacts by Outfitting and Guiding.

1. Management Area Direction

Several years ago, SDTWS issued a resolution in support of designation of certain lands within MA 1.2 for congressionally approved Wilderness. Until that is a reality, it is imperative that NNF continue to manage and monitor human activities on these special places to avert any changes to the landscape which could cause the designation to fail. Secondly, Wilderness designation aside, these small areas were identified as being extremely unique due to their physical, biological and aesthetical values. We would be extremely hesitant to support *any* type of outfitting and guiding into these lands when hundreds of acres elsewhere within NNF would be available for special use permits and recreational pursuits. Therefore, we recommend that MA 1.2 be removed from consideration.

The other management areas we listed above also require extreme scrutiny or merit denial for certain types of outfitting and guiding, such as black-footed ferret habitats.

2. Commercialization and Privatization of Wildlife and Fisheries Resources

Outfitting and Guiding for hunting and fishing on "state" owned lands in South Dakota, is not allowed (South Dakota Codified Law 41-4-13) and we do not support it on federal public lands. In 2006, we submitted a comment letter to Ft. Pierre National Grasslands regarding this issue. The topic caused us to formalize a resolution to oppose the practice of private individuals and groups to dictate or control access and/or utilization of public waters, fish and wildlife resources.

Outfitting and guiding is capitalistic, economic benefit to private parties and wildlife and fisheries on public lands belong to all citizens. These types of recreational pursuits are offered on private lands all across South Dakota and neighboring states. Outfitting and guiding may have its value in rugged, remote locations in other western states. But in South Dakota, there are ample opportunities and access routes for the public to hunt and fish without potential conflicts from commercial enterprises. Unlike most western states South Dakota Game Fish and Parks does not license guides and outfitters which would create another special interest group linked to hunting and fishing activities. This leaves the monitoring and enforcement entirely with your LE staff on the NNF with no other state rules and statutes dealing with the outfitting activities in South Dakota.

The South Dakota Department of Game, Fish and Parks works tirelessly to assure public access to state lands, and in addition, the agency pays private landowners for the "walk-in hunter access program" (1.2 million acres) with detailed maps and GPS tools, with many of these ranches adjacent to BLM, and USFS holdings where guiding is not allowed. At the present time there is sufficient motorized public access on both Forest Service and Bureau of Land Management lands in South Dakota, again with maps and GPS capability through the Game Fish and Parks web site. We are very privileged in this state to have readily available public lands at a moment's notice. Outfitting and guiding for hunting and fishing on NNF should not be approved because it is reasonably available elsewhere.

3. Monitoring and Enforcing of Special Use Permits

Our chapter includes wildlife and natural resource experts across many disciplines and a variety of employers. We are very aware of budget shortfalls and insufficient staff to carry out agency direction and meet public needs. Certain types of outfitting and guiding could have their place on NNF and encourage kids and families to connect with the outdoors. We ask NNF to consider before approving any outfitting and guiding, how it will find the resources to monitor and enforce additional special use permits.

The South Dakota Chapter of The Wildlife Society appreciates the opportunity to participate in this survey. Please continue to send correspondence to our Chapter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Norton', written over a horizontal line.

Mark Norton, President-elect
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