



THE WILDLIFE SOCIETY

South Dakota Chapter

1112 Westwood Drive

Pierre, SD 57501

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

February 17, 2015

Subject: West Hell Reforestation CE
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 2,052 acres within the Jasper Burn. 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 Hell Canyon area, identified as West Hell Reforestation East.

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 if BBNF intends to keep the West Hell Reforestation East in 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.

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, Elk Mountain and the newly established Hell Canyon herd. Bighorn sheep were released in Deadwood February 2015, but the outcome of this augmentation will not be known for some time. Our Chapter has been involved and supports bighorn sheep relocation and management throughout South Dakota.

In the year since this herd was augmented, the Hell Canyon herd is demonstrating yearlong use of this area. The effects of the Jasper fire (early successional habitat) and the rugged Canyonlands are proving to provide high quality bighorn sheep habitat. The habitat needs of bighorn sheep were outlined in our April 2014 letter to BHNF regarding similar replanting proposal on Elk Mountain. 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 in Region 2, this project will have a negative impact on bighorn sheep as timbered habitats are not compatible with bighorn sheep summer, winter or year-long range selection. If this herd is negatively impacted and forced to move out of the area by the proposed project, we believe that there could be cumulative impacts to all bighorn populations in the Black Hills.

A Categorical Exclusion does not provide adequate information on the environmental impacts of the proposal to replant pine within the entire project area in Jasper Burn. The vegetation conversion due to restocking ponderosa pine would have several possible outcomes which we request be evaluated: reduction of available open grasslands, woody draws and forage. We believe these cascading events could initiate a cause and effect relationship between the proposed action and the wildlife habitats within Jasper Burn.

We request that BHNF assess these potential consequences and outline for public review the mitigation practices to avoid harming bighorn sheep and their preferred open habitat. The BHNF should analyze and consider the added costs of planting pine and associated treatments to reforest this area. We fail to see a benefit of additional pine habitats to wildlife, the public and the BHNF.

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 land around Hell Canyon and throughout Jasper Burn. BHNF project evaluation should look at options to reclassify these 2,052 acres, and other early successional habitats in large burns, into a category that does not require timber planting to meet federal law. BHNF should also consider assigning a new Management Area designation for open habitat with a specific bighorn sheep emphasis.

The Elk Mountain Reforestation project was postponed, which we greatly appreciate. We hope a similar resolution can be made for West Hell Reforestation.

We urge BHNF to use every available directive and law to avoid irretrievable, detrimental impacts to this population of bighorn sheep in Hell Canyon.

Sincerely,

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

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