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Mathias Wallace
Nebraska National Forests and Grasslands
125 North Main Street
Chadron, NE 69337

Dear Mr. Wallace:

The Central Mountains and Plains Section (CMPS) of The Wildlife Society is responding to your recent request for comments on the need for outfitter and guide permits on public lands under your jurisdiction in Nebraska and South Dakota. CMPS encompasses the states of Utah, Wyoming, Colorado, North Dakota, South Dakota, Nebraska, and Kansas. The Wildlife Society is a professional organization that strives to ensure that wildlife and habitats are conserved through management actions that take into careful consideration relevant scientific information. We are advocates for effective wildlife policy, law, and programs that benefit wildlife and stewardship of our public trust natural resources. One of the priorities of The Wildlife Society is endorsement of the North American Model of Wildlife Conservation, better known as the Public Trust Doctrine, which addresses government ownership of wildlife and natural resources and should be managed for the public.

The national forests and national grasslands that you administer in Nebraska and South Dakota are extremely important native grassland ecosystems. Federal laws, regulations and your current Land and Resource Management Plan provide a strong mandate to conserve grassland biological diversity, and the importance of this mandate will continue to grow given declining grassland acreages (cultivation) and increasing grassland degradation (cheatgrass and other invasives) across the central and northern plains. These public lands are especially important to several flagship grassland species, including black-tailed prairie dog, black-footed ferret, northern swift fox, sharp-tailed grouse, and greater prairie-chicken. Issuance of outfitter and guide permits for hunting and other outdoor activities could substantially increase recreational use and activity in some areas, resulting in possible negative impacts to wildlife, wildlife habitat and biodiversity. For these reasons, we recommend that your needs assessment evaluate resource capacities for potentially impacted wildlife species or habitats and that you use the best quantitative information available to conduct the assessment.

We also recommend that, when assessing the need for outfitting and guiding permits for hunting on public land, you consider the relatively small amounts of public land available for hunting in Nebraska and South Dakota, approximately 2% and 6% of the total land area in each state, respectively. At the same time, outfitting and guiding services for hunters on private deeded or leased lands are considerable, and we are unsure of the need for additional services on the limited public land acreage. Small game hunters are declining across the Great Plains states and much of the decline is related to lack of hunting opportunity along with increases in fee hunting on private lands, thus a reliance on public lands. Allowance of outfitters and guides to federal lands could cause hunters to lose even more

interest and cause further declines in hunter base. Access for hunting is specifically addressed in the North American Model of Wildlife Conservation http://wildlife.org/documents/technical-reviews/docs/ptd_10-1.pdf with concerns for hunters in the future.

The Central Mountains and Plains Section of The Wildlife Society recommends that Special Use Permits not be issued to outfitters and guides during your needs assessment process. Thank you for allowing us to comment and if you have any questions, please feel free to contact me.

Sincerely,



William L. Vodehnal, President
Central Mountains and Plains Section
The Wildlife Society