



DEPARTMENT OF GAME, FISH, AND PARKS

MEMORANDUM

October 20, 2017

To: Scott Jacobson, BHNH National Forest Advisory Board (NFAB) Committee Coordinator
From: Kelly Hepler, Department Secretary and Primary NFAB Member
Tony Leif, Wildlife Division Director and Secondary NFAB Member
CC: Mr. Bob Burns, Chairman, BHNH NFAB
Re: NFAB 10-19-17 revised comments on the Black Hills Resilient Landscapes (BHRL) Project DEIS

On behalf of the SD Department of Game, Fish and Parks (SDGFP), Tony and I greatly appreciate all efforts by the subcommittee and NFAB to develop a letter of recommendations on the forest-wide project Black Hills Resilient Landscapes (BHRL). I would have preferred to voice our agency suggestions at the recent NFAB meeting but was unable to attend. Please accept these comments in lieu of my absence. SDGFP will be submitting separate comments on the BHRL DEIS. To ensure consistency with NFAB revised comments and our agency comments, I need to proceed carefully. In that context, I vote NO at this time. I realize that the NFAB consensus will result from the multiple-uses and interests represented on the Board, not just the interests my position represents.

At the NFAB meeting, Supervisor Mark Van Every asked the Board to not get lost in recommendation details, but stick to recommending how BHNH could wisely use its limited resources to focus management efforts towards the resiliency theme of BHRL. Because of Mark's request, I present concise reasons for a NO vote:

1. NFAB letter, paragraph 2 states that the [D]EIS is comprehensive and actionable. We disagree. The DEIS is not concise nor efficacious because it lacks the significant and required design criteria, mitigation measures, and implementation guides that are directly tied to effects analysis for site- and species-specific habitat management practices. It is extremely difficult, for example, for my agency specialists reviewing the DEIS, to provide meaningful and useful wildlife and fisheries habitat data and suggested design criteria for the FEIS when no draft design criteria were included in the DEIS. The lack of design criteria, mitigation measures, and implementation guides (similar to what was included in Mountain Pine Beetle Response Project FEIS and after the ROD) is not conducive to effective habitat conservation practices that both our agencies strive to implement. SDGFP is very much committed to working with the BHNH resource specialists throughout this NEPA process and eventual timber treatments. Therefore, we recommend that these lacking directives be included within the DEIS and that the public be given a reasonable opportunity to respond and comment.

2. *Mechanical Site Preparation* paragraph was removed and we recommend it be restored. Until we consult with plant specialists that know how non-native, rhizomatous grasses respond to both prescribed fire *and* mechanical ripping, we cannot support this method of pine establishment. We do not support its use in native plant communities. The DEIS effects analysis lacked information of how this method is successful in non-native sod and did not offer options to hand seed/plant instead.

3. During the forest-wide Decision Notice (2003) for Noxious Weed Management Plan, BHNH and SDGFP specialists discussed the use of domestic livestock (sheep and goats) for weed control. Because of the known disease transmission issues between these domestic stock and bighorn sheep, the option to use trained sheep or goats to reduce noxious weeds was tabled. The USFS Region 2 wildlife biologist concurred. In the nearly 15 years since Weed Plan, there may be additional information and science to renew this discussion or conclude that it is still not a management option in order to retain viable bighorn sheep populations in the greater Black Hills. These discussions would not be able to be conducted within the BHRL timeframe but we are willing to discuss at a more convenient time.