

## THE WILDLIFE SOCIETY

*South Dakota Chapter*

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September 16, 2016,

Black Hills National Forest  
Mark Van Every, Forest Supervisor  
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Subject Line - Rushmore Connector Trail

The South Dakota Chapter of The Wildlife Society (SDTWS) submits comments concerning a new hiking trail, campground and other new developments and special use permits across the Black Hills National Forest and Mount Rushmore National Memorial. Our organization has an interest in this project and we appreciate the opportunity to comment. 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://wildlife.org/south-dakota-chapter/>

Both motorized and non-motorized recreational demands continue to expand and increasing on public lands. SDTWS understands the need to keep people engaged in outdoor opportunities. However, along with formal federal rules, there should be some type of land ethic and carrying capacity assessment as demands for outdoor pursuits increase.

Today, there are numerous opportunities for motor touring, hiking, helicopter flights, camping, rock climbing, horseback and bicycle riding, fishing, photography and scenic viewing within this high peaks area. These opportunities are abundantly and easily available and speak to the facts that the project area is already developed. SDTWS submits that this trail, infrastructure and human uses have great potential to over utilize and diminish desired resource protection objectives in portions of the project area. SDTWS does not believe these are the intentions of the Forest Service, the National

Park Service, and Department of Game, Fish and Parks; but are very real outcomes. We provide supportive documentation.

The proposed route should be relocated from areas where travel will increase demands upon the Norbeck Wildlife Preserve, Peter Norbeck Scenic Byway, Black Elk Wilderness and portions of the Blackberry Trail. We also request that the values, vision and intentions inherent in the legislative acts of the Norbeck Wildlife Preserve, Scenic Byway, Black Elk Wilderness and Mt. Rushmore not be forgotten. Review of previous decisions and laws for these areas should be included.

### ***Review of the Trail and Recreation Scoping Notice***

#### **Black Elk Wilderness, Peter Norbeck Scenic Byway and Norbeck Wildlife Preserve on Black Hills National Forest**

SDTWS believes this hiking trail is inconsistent with the Black Hills National Forest Plan, federal laws and past actions taken by Black Hills National Forest for the Norbeck Wildlife Preserve (referred to as Norbeck). The Norbeck was created by the Norbeck Organic Act public law 258 in 1920 and Black Elk Wilderness (originally part of the Norbeck) was congressionally designated as wilderness in 1980. The Scenic Byway was established in 1991. Other alternative trail routes are required to avoid these three areas. SDTWS believes project recreational developments within Norbeck, the Scenic Byway and Black Elk or that are strategically placed immediate to the Norbeck boundary (campground) are actions that are not acceptable to meet the laws established for these areas.

Congress designated Norbeck for game animals and birds and their breeding places. The proposed Rushmore Connector trail and campground projects will only add to an already pressured area. An outdoor recreation carrying capacity study is required.

The District Court of South Dakota stated that “although the National Forest Management Act generally applies to the National Forest System, courts cannot apply the NFMA in such a way as to run counter to the Norbeck Organic Act when dealing with the Preserve.”

In the late 1980's, the Forest Service realized that there was a need for analysis and management actions for the Norbeck. Recreation was a top issue. The final decision by the Forest Supervisor in 1989 took into consideration the high demands at that time placed on the Norbeck and its connection to the Black Elk Wilderness. The management direction from the 1989 decision carried over to the current 2006 Black Hills National Forest Plan. Recreational pursuits in these two areas have likely not stabilized or decreased since 1989.

### **Wildlife**

As wildlife professionals, SDTWS believes it should not be the burden of wildlife and habitats to defend themselves as they are not proposing additional recreational pursuits. It should be the burden of human users to clearly demonstrate, measure and propose

mitigation to improve current resource conditions and not degrade or negatively impact breeding habitats for wildlife.

There are several big game species in Norbeck and Black Elk that could be impacted by the proposed trail. For example, increased human activities adjacent to primary mountain goat range could have negative effects on this big game species. We are unfamiliar with Mt. Rushmore's management plan and position on mountain goats within the Memorial. Trail alternatives should discuss how the Memorial is accommodating mountain goat management.

Consider and propose seasonal closures to mitigate for wildlife disturbances.

With three other campgrounds managed by the Forest Service along this trail or nearby, in addition to a large KOA campground, we find no reason to develop an additional campground conveniently located just outside the Norbeck Wildlife Preserve and Black Elk Wilderness. Installation of a highway underpass only serves to concentrate people and horses to these two areas. SDTWS can think of no wildlife safety or value in an underpass shared by people, dogs and horses. SDTWS cannot support either of these developments because they directly increase impacts to - wildlife in Norbeck by skirting Forest Plan directives.

#### Blackberry Trail

Mount Rushmore may rehabilitate the Blackberry trail to accommodate horses and riders. If there are no plans to construct additional trailhead or parking facilities, how will one heavily used trail allow horse use in the Memorial? The impacts of horses will be – extremely significant, in addition to human foot traffic. These cumulative effects need to be assessed and addressed.

#### Project Options for Norbeck, Black Elk and Scenic Byway

The proposed route shows only one alternative to enter Mt. Rushmore. Other options should be explored to stay outside of Norbeck, the Scenic Byway and Black Elk.

If the EIS does not consider other options to connect the trail to Mt. Rushmore, the new trail should have minimal occupancy in the three areas and reasonably parallel Highway 244 Peter Norbeck Scenic Byway or other existing trails where disturbance already exists. Nearly 5 miles of trail within these areas is not minimal considering the 20-foot width and connected disturbances surrounding the trail. With no net increase in trails in Norbeck (5.4A 5103), portions of existing active trails should be evaluated for closure.

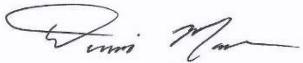
SDTWS also recommends no additional or expansion of scenic overlooks, spurs, rest or day use areas.

No increase beyond the existing three outfitter-guide permits. Current permits should stay valid only as long as the terms are met and resources are protected.

No expansion of group numbers, visits or duration through Black Elk, and no changes to the Centennial Trail system or current management direction to accommodate more use leading to the trail system in Mt. Rushmore.

In conclusion, SDTWS cannot support this recreational development in its entirety. The EIS needs to consider the ecological services of wilderness and Norbeck habitats valued by Native American tribes, visitors, and the wildlife that reside there; "a land ethic". Please continue to send correspondence to our Chapter on this important proposed project.

Sincerely,



Dennie Mann  
Chairman SDTWS Public Lands Committee, 4012 Oiler Lane, Rapid City SD 57701