



**ROCKY MOUNTAIN
ELK FOUNDATION**

March 7, 2023

Rob Hoelscher
District Ranger
Hell Canyon Ranger District
Black Hills National Forest
1019 North 5th St.
Custer, SD 57730

Mr. Hoelscher

The Rocky Mountain Elk Foundation's (RMEF) mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. We represent more than 225,000 members nationwide and more than 4,500 members in South Dakota. Since its inception in 1984, RMEF has conserved or enhanced more than 8.6 million acres of North America's most vital habitat for elk and other wildlife, including more 128,000 acres in South Dakota. RMEF appreciates the opportunity to comment on the Newark Exploration Drilling Project (project) proposed within the Hell Canyon Ranger District.

RMEF expresses initial concerns about the proposed project as it occurs within and adjacent to Management Area 5.4 (Big Game Winter Range Emphasis) identified in the current Black Hills National Forest Plan (2006). These areas are managed to provide high-quality winter and transitional habitat for deer and elk, high-quality turkey habitat, habitat for other species, and a variety of multiple uses. The Plan identifies these areas as representing the traditional wintering sites selected by deer and elk and important transitional habitats where deer and elk often linger, giving birth to their young before returning to summer ranges elsewhere in the Black Hills.

RMEF calls attention, specifically to 5.4-1501 (standard) and 5.4-9101 (standard) within the Plan and asks that the Forest assess the proposed project's impacts to these Plan components. Extended disturbance (as would occur likely during this proposed project) in Management Area 5.4 may lead to increased disturbance (and substantial effect) to elk on winter range and in calving areas during the reproductive season. RMEF recommends assessment whether a categorical exclusion appropriately accounts for these Plan components and how this project decision proposes to minimize disturbance to elk during critical periods and to maintain elk residency on National Forest System lands.

RMEF has had a strong working relationship with Black Hills National Forest and looks forward to future work together.

Sincerely,

Karie Decker
Director of Wildlife & Habitat