



September 3, 2024

Jacob Thelen
Jacob.thelen@usda.gov

RE: Magpie Rocky Mountain Juniper (*Juniperus scopulorum*) reduction project

Dear Mr. Thelen:

The North Dakota Game and Fish Department (Department) has received notification of the Forest Service's proposal to reduce Rocky Mountain Juniper in Sections 20, 21, 22, 27, 28, 29, 30, 33, 34, T145N R101W, 5th PM, McKenzie County, North Dakota (Magpie project area). We would like to use this opportunity to provide comments and recommendations on the project.

Whether through the use of prescribed fire, mechanical treatment, or a combination of both, the Department has long promoted and supported the management and reduction of woody species encroachment in the badlands and grassland prairie of western North Dakota to maintain the integrity and functions of these habitats, which are vital for the wildlife that inhabit them. The Department is supportive of these efforts and are hopeful that this project specifically will benefit both the Magpie Creek and Cedar Top Butte herds.

With that said, we would like to take this opportunity to make a few minor suggestions. First, We request that project not begin until August 1st at the earliest, with a September 1 start date being preferable, as there is the potential for significant lambing disturbance in the areas. Lastly, when juniper management is being conducted, it is important to ensure the most effective and beneficial method for tree removal is selected. Mastication has been shown to have slow decomposition rates, with the litter acting as a mulch rather than being decomposed by the microbial community. This may increase fuel load and fire severity, negatively influence the plant community, and promote undesirable species, such as Canada Thistle (Fire Science Brief, 2011). Though it can also be a cost-effective approach, it is important that all treatment options be weighed and the method most conducive to the soils, hydrologic function, plant composition and wildlife of the specific landscape be selected.

We appreciate the opportunity to comment on the proposed vegetation management plan and ask to be informed about final decisions on project development.

Sincerely,

Bruce Kreft
Conservation Supervisor

Governor
Doug Burgum

Director
Jeb Williams

Deputy Director
Scott A. Peterson