



# At Risk Species

## Comments and Responses on Draft Assessment



American three-toed woodpecker and Leedy's Roseroot growing on rock (right), Black Hills National Forest.

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## **Introduction: Assessment Response to Comments**

The Black Hills National Forest received a variety of public comments on draft assessments published in June 2022. Some commenters have expressed support for the draft assessments, while others have expressed concerns.

Those who express concern about the draft assessments often state that they believe the assessments do not go far enough in addressing the challenges facing the Black Hills; do not address the needs of local communities; or do not utilize the best available scientific information. Those that support the draft assessments often state that they are pleased with the level of detail and analysis that went into the assessments. They believe it will provide a good foundation for the need to revise the land management plan.

The Forest Service has reviewed all public comment received on the draft assessments and used this feedback to revise assessments where appropriate. The table below is a detailed summary of public comment received related to at risk species as well as the agency's response to each item. Many responses indicate where the revised assessment has been modified to better explain each item, or incorporate new information as provided by cooperators or the public.

Each comment and response table is provided not as a matter of regulatory compliance, but as an effort to demonstrate the Black Hills National Forest's commitment to transparency early in the plan revision process. Some comments below have been generalized or combined with similar comments to provide a more efficient response. No attempt has been made to retain a link between each comment and individual, organization, or entity that provided it.

## Response to Comments

Comment	Responses
Comments received requesting a Need for Change section in the assessment.	Thank you for your comment. A section on potential needs to change the forest plan has been added to the revised assessment. This is more of a general process discussion at this point because there will be very specific species evaluations for Species of Conservation Concern (SCC) consideration throughout the plan revision process.
Comments received regarding formatting, typos, word-choice, defining common terms, and mislabels.	Thank you to the commentors who noted issues. These have been corrected throughout the assessment as appropriate.
Comments received about how species lists tables are organized by type of species type (vascular plant, non-vascular plant, animal, invertebrate) or by name (common vs. scientific).	Thank you for the interest. The Forest has made the editorial choice to sort lists by scientific name in alphabetical order. We did separate the lists into plants and animals.
Comments received asked for clarification about who the decision maker is for Species of Conservation Concern and that this assessment only lists at-risk species and potential Species for Conservation Concern based on established criteria.	Thank you for the recommendations. The assessment was reviewed to ensure inclusion of a list of species that meet the criteria for Species of Conservation Concern, and that the Regional Forester is the decisionmaker. Further, the revised list in the final assessment will continue to undergo review and comment throughout the planning process.
Commentors suggested white-tailed deer be included as well as mule deer as game species.	Thank you for the recommendations. White-tailed deer has been added into the list of game species.
Comments received that disagree with grazing being listed as a stressor for some species or habitat types. In addition, some commentors asked for clarification about defining gradations of grazing or stressors.	Throughout the assessment grazing is acknowledged as an activity occurring on the landscape that can either benefit or impair a habitat type or species. The benefit or risk depends on use, intensity, location, or other factors. Including grazing as an element affecting landscape health is necessary in order to properly describe the interactions of different activities across various habitat types. Language describing when it is a stressor or when it is a benefit has been added in order to better describe the complexity of habitat interactions. Further, several references used to develop this assessment also include grazing as an activity that affects habitat health and structure.

<b>Comment</b>	<b>Responses</b>
<p>Comments received regarding references cited noting that some references were missing or needed correction.</p>	<p>Thank you for the information. The References section has been updated as appropriate.</p>
<p>Comments received disagreed with the sources used, note that some of them seem dated, note that some references were missing or needed correction, and ask for source and citations to be reviewed or updated. Related comments ask for assurance that best available scientific information (BASI) be used.</p>	<p>For each of the at-risk species that is known to occur on the Forest, we completed a “species overview” based on details in FSH 1909.12. These overviews (USDA Forest Service 2023a and 2023b) are designed to capture the best available science information following current manual and handbook direction. These overviews highlight key elements of life history, distribution, risk factors and ecological conditions necessary for recovery, conservation, and viability of at-risk species. Species overviews include key information gaps and uncertainties. When commentors provided specific resources or citations, we reviewed these and incorporated as appropriate. The References section has been updated as appropriate.</p> <p>The USFS (Forest Service) regularly updates its databases from the state natural heritage programs.</p> <p>We invite commentors to resubmit potential sources if appropriate during other planning phases, such as environmental analysis (NEPA).</p> <p>The USFS interprets BASI to mean the best currently available scientific information. Thus, we do not create new studies or seek new data collection at this phase of the planning process. As such, the agency made use of what is currently available, even if techniques and technology exist that would allow for more research.</p>
<p>Comment noting that Rocky Mountain Juniper is not an at-risk species and requesting it be removed from the document.</p>	<p>Rocky Mountain Juniper is included in the assessment as a habitat type rather than an at-risk species.</p>

*Black Hills National Forest  
Response to Comments—At Risk Species*

<b>Comment</b>	<b>Responses</b>
<p>Comment received requesting Black-footed ferret be removed from the at-risk species list.</p>	<p>The Forest recognizes that the species is not currently found in the project area. This is acknowledged in the assessment with the following language: “With respect to federally listed threatened and endangered species, as well as proposed and candidate species, the assessment may include species not present immediately within the plan area, such as endangered Black-footed ferret. They are not within the plan area, but the plan may impact the potential for range expansion.” The list of species was developed using required criteria described in regulation.</p>
<p>Comments requesting reference to prairie dogs be removed from the document and that prairie dogs are not an at-risk species.</p>	<p>The assessment includes prairie dogs only in the description of ecological requirements and suitable habitat for Black-footed ferrets since Black-footed ferrets rely on prairie dog colonies for potential habitat. Prairie dogs are not included as at-risk species.</p>
<p>Comment regarding the occurrence of <i>Sphagnum angustifolium</i> mentions that one specimen of the species was collected and later found to be a different species.</p>	<p>Thank you for the information. Clarifying language is included in the description of the species distribution in Table 2.</p>

<b>Comment</b>	<b>Responses</b>
<p>Comments received related to how plan components and future management actions will be developed as related to species conservation. Suggestions included specific activities or management priorities related to:</p> <ul style="list-style-type: none"> <li>-fishing</li> <li>-timber harvest</li> <li>-species management</li> <li>-species viability</li> <li>-exotic species</li> <li>-recreational activities</li> <li>-urbanization</li> <li>-human population increase</li> <li>-climate change</li> <li>-fuels management</li> <li>-vegetation management</li> <li>-clear cuts</li> <li>-overstory removal</li> <li>-livestock grazing</li> <li>-wildlife grazing</li> <li>-congruence with local community plans</li> <li>-conifer removal related to management of burr oak and birch</li> </ul>	<p>Plan components will be considered during the plan development phase of the planning process. We look forward to hearing from stakeholders about plan component recommendations during that phase. Further is some of these warrant analysis as potential environmental effects, please raise them as issues during the analysis (NEPA) phase.</p>
<p>Comments received asking for status and distribution of all species or common species that occur in the planning area, including those that are not considered at-risk.</p>	<p>This assessment focuses on the evaluation of existing information about relevant ecological, economic, and social conditions, trends, and sustainability for topics specific to management of national forest lands and resources according to topics determined in regulation. This topical assessment focuses on At-Risk Species rather than all species that occur in the planning area. If other species or habitats warrant further inclusion in the planning processes, please bring those up during future phases of the process.</p>
<p>Comment regarding the distribution of the Finescale Dace with information about the condition of Hemler Reservoir (drained) and Geis Reservoir (breached).</p>	<p>Thank you for the information. The assessment was updated to note that the two reservoirs no longer exist.</p>
<p>Comment received questioning the fish species that were included as not being native to the planning area.</p>	<p>After review, the fish species included in the assessment are native and known to occur.</p>

*Black Hills National Forest  
Response to Comments—At Risk Species*

<b>Comment</b>	<b>Responses</b>
Comments received suggesting inclusion of other game species be listed in discussions of game.	Thank you for the recommendation. Additional game species have been added to assessment.
Comment received asking for more information about how white-nose syndrome affects all bat species within the planning area.	This assessment focuses on the evaluation of existing information about relevant ecological, economic, and social conditions, trends, and sustainability for topics specific to management of national forest lands and resources according to topics determined in regulation. This topical assessment focuses on At-Risk Species rather than all species that occur in the planning area. If other species or habitats warrant further inclusion in the planning processes, please bring those up during future phases of the process.
Comments requested a full list that was considered and the justification for why certain species were not included.	The Forest Service commissioned a species overview for every species that met the “Must Consider” or “Should Consider” criteria for SCC as outlined in the Land Management Planning Handbook. The overviews were reviewed by USFS biologists who then summarized the information in spreadsheets. These spreadsheets are part of the project record and will be publicly available.
Comments requested clarification about climate change projects, potential risks from climate change, and resources used to define and project climate change.	The USFS use a number of sources to analyze the risk of climate change to each species. This includes reports from Intergovernmental Panel on Climate Change and Climate Change Vulnerability Risk assessments developed for the Black Hills and surrounding areas.
Comments requested snags be better described as habitat for black-backed woodpeckers.	Thank you for the information. The importance of snags to many wildlife species, including black-backed woodpeckers, is well known and has been included in the habitat features throughout the assessment.
Comment requested commercial logging be listed as a potential threat in association with insect infestations and subsequent tree mortality.	Timber harvest is listed as a potential threat to multiple forested ecosystems, as is pine beetle. The current draft of the At-Risk Species Assessment lists pine beetle and "timber management" among the causes of decline among late-successional habitats.



<b>Comment</b>	<b>Responses</b>
<p>Comments suggesting expanding ecological conditions for some species. Specific examples include:</p> <ul style="list-style-type: none"> <li>-livestock grazing</li> <li>-beaver population decline</li> <li>-snags</li> <li>-dead and down trees</li> <li>-abandoned mines</li> <li>-granite outcrops</li> </ul>	<p>Thank you for the suggestions. They were considered and some updates were included in the assessment as appropriate.</p>
<p>Comments regarding risks brought up issues or questions about additional risks or suggest some risks were under-estimated. Risks suggestion for more description or inclusion include:</p> <ul style="list-style-type: none"> <li>-timber harvest impact on additional habitats than what is listed</li> <li>-vandalism and lack of maintenance at bat gates</li> <li>-pollution and runoff</li> <li>-pesticide and herbicide risks to monarch butterflies</li> <li>-recreational activities across Forest and for several habitats/species</li> <li>-monitoring and research activities across Forest and for several/species including the species being monitored or studied</li> <li>-additional diseases suggested such as white-nose syndrome for all bats and sylvatic plague for black-footed ferrets</li> <li>-competition from conifers affecting oaks and birch</li> </ul>	<p>Thank you for the suggestions. They were considered and some updates were included in the assessment as appropriate. For example, pesticides are listed as a risk factor for Monarch butterfly, more discussion is included about white-nose syndrome and bats, pollution is listed for lakes and reservoirs, and recreation is listed as a risk factor for several species.</p>
<p>Comments requested additional species be considered as at-risk and that their associated habitats be described in more detail. Including the following:</p> <ul style="list-style-type: none"> <li>-American marten</li> <li>-Northern goshawk</li> <li>-brown creeper</li> <li>-North American beaver</li> <li>-western bumblebee</li> <li>-Black Hills redbelly snake</li> <li>-northern leopard frog</li> <li>-wood frog</li> </ul>	<p>The approach for identifying and Assessing At-Risk species is determined by Forest Service policy and regulation. A summary of the approach is included in the assessment and shows several steps and factors.</p> <p>After reviewing the suggestions made by commentors, and after reviewing the initial list and approach, several changes were made to the assessment.</p>

<b>Comment</b>	<b>Responses</b>
<p>(Continued from previous page)</p> <ul style="list-style-type: none"> <li>-pygmy nuthatch</li> <li>-northern flying squirrel</li> <li>-mountain sucker</li> <li>-longnose sucker</li> <li>-lake chub</li> <li>-mule deer</li> <li>-pinyon jay</li> <li>-peregrine falcon</li> <li>-Lewis’s woodpecker</li> <li>-black-backed woodpecker</li> <li>-ruffed grouse</li> <li>-Cooper’s Rocky Mountain snail</li> <li>-frigid ambersnail</li> <li>-tawny crescent butterfly</li> <li>-Atlantis Fritillary (<i>Speyeria atlantis</i> pahasapa)</li> <li>-bighorn sheep</li> <li>-<i>Myotis thysanodes pahasapensis</i></li> <li>-<i>Myotis evotis</i></li> <li>-<i>Myotis Volans</i></li> <li>-<i>Corynorhinus townsendii</i></li> <li>-<i>Perimyotis subflavus</i></li> <li>-dippers</li> <li>-white-winged junco</li> <li>-jumping mouse</li> <li>-invertebrates</li> <li>-various fish</li> <li>-various snails</li> <li>-various bats</li> <li>-State-listed species that are not federally listed</li> <li>-S1, S2, and SU state-sensitive plants found in the Black Hills</li> <li>- U.S. Forest Service Region 2 sensitive species list</li> <li>-WY Natural Diversity list</li> </ul> <p>Other comments received requesting less emphasis or non-inclusion of some species and their associated habitats. Including the following:</p> <ul style="list-style-type: none"> <li>-American kestrel</li> <li>-black-chinned hummingbird</li> <li>-Brewer's sparrow</li> </ul>	<p>(Continued from previous page)</p> <p>In addition, the potential SCC list was updated and now includes more species (plant, animal, invertebrates). Note that the SCC list may be subject to revision throughout the planning process.</p> <p>Other species were considered but did not meet criteria at this preliminary draft step of the SCC process. SCC evaluation will continue throughout the plan revision process.</p>