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South Dakota Stockgrowers Association
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Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130
Bozeman, MT 59771

Dear Plan Revision Team,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the Draft Revised Forest Plan for the Custer Gallatin National Forest. We sincerely appreciate the amount of work that goes into these plans and are grateful to you for taking on such an endeavor.

The South Dakota Stockgrowers is the oldest state-run livestock association in the United States dating back well into the 1800's. We represent livestock producers throughout the state of South Dakota and beyond. We have many members who will be directly affected by this new plan and are happy to comment on behalf of livestock producers and community members throughout the region.

Wilderness – We do not support any designations as Wilderness areas, or Recommended Wilderness Areas. We especially do not support any of these areas in the Sioux RD. We would prefer Alternative E and believe that option leaves the most flexibility in your ability to properly manage forestlands as you see fit. There are areas that should be “untrammelled by man”. With the most flexibility you can manage these areas as you see fit. We do not encourage the management of any areas in the Sioux RD as Wilderness.

Backcountry – We do not support any designations as Backcountry areas. We agree with Alternatives A, B, C, and E, that no part of the Sioux RD should be considered as Backcountry Areas. The Relative Contributions to Key Social Benefits from your analysis that Alternative D provides the greatest amount of “Scenery, and Inspiration” are extremely subjective and should not be considered. Some believe seeing domestic livestock, timber production, and people working are scenic and inspiring.

Recreation Emphasis Area – We understand this option as an alternative to Wilderness and Backcountry designations. We agree with all Alternatives that there should be no Recreation Emphasis Areas within the Sioux RD. We recommend the fewest Recreation Emphasis Area acres possible since that is unfairly promoting one use of the multiple-use forest over other equally important uses. We prefer Alternative A.

Bison We support Alternative E. Bison and other large herbivores are extremely similar. By choosing one over another the Forest Service is picking winners and losers. We understand the importance of using grazers as a management tool. Favoring the harder to manage bison over cattle simply because some people would rather see them on the landscape is short-sighted and counterproductive. Cattle are easier to manage and therefore provide better opportunities to manipulate the rangeland for desired outcomes. Favoring bison and year-round grazing will undoubtedly lead to degraded riparian zones and range conditions as these animals will not be moved and will congregate in certain areas as has been proven by numerous research projects on both bison and cattle. Management is the key, and cattle are much easier to manage.

Disease is another very important consideration when deciding what type of grazers should be utilized on the National Forest. Brucellosis is an extremely costly disease for producers and the economy as a whole. Once a state loses its brucellosis free status, the entire economy suffers greatly. Luckily, the vaccines to prevent this disease are very effective. These vaccines are effective in cattle, bison and elk. Cattle are much more easily vaccinated and managed and therefore much less likely to contract and spread this disease. Unvaccinated bison will eventually contract brucellosis and likely wander far and wide spreading this abortion-causing disease to other bison, elk herds, and cattle herds to the detriment of cattle producers, sportsmen, and the general public.

Connectivity is a catchphrase word made up by certain segments of activists who wish to control more private land. Connectivity and “key linkage areas” should not be considered when making decisions on what animals are permitted to graze on National Forests. Animals, both wild and domestic, establish routes and corridors. Again, if the goal is to manage the rangeland for proper function and resiliency, the more domesticated cattle are more efficient at accomplishing this task. If the goal is to promote one animal (bison) over another (cattle), you should consider the above information.

Domestic Sheep or Goat Usage – We prefer Alternative A or E. These alternatives offer the most flexibility for mitigation techniques of potential disease transmission to native big horn sheep. Some groups want to simply eradicate the use of these animals from the forest system. “The scientific literature on the risk of disease transmission between domestic sheep and goats (including pack goats) and big horn sheep is not complete” – James Wilder, Andrew Pils *Risk Analysis of Disease Transmission Between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep* 2017. This statement from your own agency’s study proves that eliminating domestic sheep and goats from the National Forest would be pre-mature. More scientific research is needed to reach a rational consensus on this issue. *If* domestic sheep and goats are proven to transmit pathogens to native big horn sheep, there should be an opportunity to vaccinate for such pathogens or explore other mitigation techniques to preserve the ability to graze and pack with domestic sheep and goats on public lands safely. Again, this points out that any forest plan that eliminates domestic sheep and goats from an area is pre-mature and quite frankly just one more pre-designed activist agenda item with the intent of ridding public lands of any use in which they do not agree with.

If it weren’t such a serious issue, it would be laughable that the agency is considering retaining the ability to use domestic sheep and goats for weed reduction and achieving desired range conditions but taking that option off the table for anyone else, including permitted livestock

grazers. Does the Federal Government have a track record of responsible resource usage and conservation better than that of anyone else? The mere mention of USFS wanting to retain the option of using domestic sheep and goats for rangeland improvement projects demonstrates the usefulness of these species in grazing plans. Your rangeland managers and permittees should be able to work together to keep this management tool available and incorporated in proper grazing plans forest wide.

Timber Production – We prefer Alternative A. The continual reduction in acres of timber production on national forests is a detriment to our local, regional, and national economy. At only 22% of the acres in the Custer Gallatin National Forest, this Alternative is miniscule in comparison to the overall acreage in the forest. Even this most aggressive plan leaves more than three quarters of the forest “Unsuitable for timber production”, and not even available to be considered for such management. We suggest re-evaluating what is “suitable” and increasing the acres available to be considered for proper Multiple-use forest management.

Timber Harvest other than Timber Production We prefer Alternative E. Like too many kids in a classroom, too many trees in one area promotes disease, general lack of vigor, unhealthy trees, non-resilient ecosystems and severe fire danger. Areas that do not have timber suitable for commercial timber production, should still be managed properly to avoid such instances. Timber harvest for any purposes benefits the local people and economies. The Custer Gallatin National Forest should open as many areas as possible to timber harvest, firewood cutting, pre-commercial thinning and proper basal area tree thinning projects.

Thank you for the opportunity to comment. We would welcome the opportunity to visit with you about any of the above statements. You can reach our office at 426 St. Joseph St. Rapid City, SD 57701, by telephone at (605) 342-0429, or via email at office@southdakotastockgrower.org

Sincerely,

A handwritten signature in cursive script, reading "James L. Halverson".

James L. Halverson
Executive Director