



August 27, 2019

Mary Erickson  
Forest Supervisor  
10 East Babcock  
Bozeman, MT 59715

Project: 190712006F - 070608002F – Draft Revised Forest Plan and Draft EIS for the Draft Revised Forest Plan, Custer Gallatin National Forest  
Location: Harding County  
(CGNF)

Dear Ms. Erickson,

Thank you for the opportunity to comment on the documents entitled “Draft Revised Forest Plan, Custer Gallatin National Forest” and “Draft Environmental Impact Statement for the Draft Revised Forest Plan, Custer Gallatin National Forest.” The South Dakota Office of the State Historic Preservation Officer (SD SHPO) would like to provide the following comments.

Draft Revised Forest Plan, Custer Gallatin National Forest

- 2.4.3 Areas of Tribal Importance and 2.4.4 Cultural and Historic Resources

The first desired condition in both sections should address the need to have comprehensive archaeological surveys completed. The second desired condition should address the protection of these non-renewable resources. In addition to the new desired conditions: goals, objectives and standards should be developed to promote a proactive approach to the management of these resources.

- 3.2.2 Distinctive Roles and Contributions

The status of the district nomination for the North Cave Hills is unknown. A final copy of the nomination was provided to the Custer Gallatin National Forest for submission to the Federal Preservation Officer.

- 3.2.3 Vision for the Sioux Geographic Area

With the high concentration of precontact cultural resources in the Sioux Geographic Area, the vision for this area should include on-going surveys (archaeological, architectural, Traditional Cultural Property) and the evaluation of cultural resources identified.

- 3.2.4 Designated Areas

The Sioux Ranger District contains a number of cultural resources that are either listed in or eligible for listing the National Register of Historic Places. If not managed appropriately, these properties could lose their status for listing in the National Register. We recommend including these areas in the list of Designated Areas in the Sioux Geographic Area.

- 3.2.7 Plan Components – Areas of Tribal Interest

The current Desired Conditions is for the North Cave Hills, but the South Cave Hills and Slim Butte have also been identified as lands with religious and cultural significance to at least four American Indian tribes. We recommend including the South Cave Hills and Slim Butte in the Desired Condition. In addition, guidelines that follow refer to Chalk Buttes, but we recommend developing Guidelines for the North Cave Hills, South Cave Hills and Slim Butte.

- Chapter 4. Monitoring Plan

We recommend establishing a monitoring plan for all historic properties under the control of your agency. The responsibility for the identification, evaluation, nomination to the National Register, and protection of historic properties is explicitly spelled out in the National Historic Preservation Act.

While this document is not intended to address issues associated with the National Historic Preservation Act, it should be noted that the intent of the National Historic Preservation Act is for Federal agencies to fully integrate historic preservation into ongoing programs. Overall, the draft plan should provide more detailed guidance for the Areas of Tribal Importance and Cultural and Historic Resources located in the Sioux Geographic Area, specifically those areas in South Dakota.

Draft Environmental Impact Statement for the Draft Revised Forest Plan, Custer Gallatin National Forest

- 3.13.1 Key Indicators and Measures

The use of vegetation management as a Key Indicator alone does not adequately consider potential effects to cultural resources because cultural resources can be significant for more than just their physical manifestation, i.e. an archaeological site. The resulting analysis

would simply reflect the number of archaeological sites destroyed or avoided, but not the actual effect on cultural resources.

It should be noted that 36 C.F.R Part 800.5, the implementing regulations for Section 106 of the National Historic Preservation Act, states “ An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.”

- 3.13.3 Environmental Consequences

Given that the Key Indicators and Measure do not accurately reflect potential effects to cultural resources, it is unclear how the environmental consequences can be assessed under any of the alternative. For this reason, we recommend the development of a Programmatic Agreement that addresses the complexities of assessing effects to cultural resources.

Should you require any additional information, please do not hesitate to contact Paige Olson at [Paige.Olson@state.sd.us](mailto:Paige.Olson@state.sd.us) or (605) 773-6004. We appreciate your concern for the non-renewable cultural heritage of South Dakota.

Sincerely,

Jay D. Vogt  
State Historic Preservation Officer



Paige Olson  
Review and Compliance Coordinator