Data Submitted (UTC 11): 4/14/2021 11:00:00 AM
First name: JOEL THOMAS
Last name: RICKENBACH
Organization: SDSGA & Pioneer Grazing Assn
Title: Director
Comments: This document serves as comment to the USFS 18-Dec-2020 Rangeland Management Directives Updates. The USFS stated goals of [ldquo]more usable, modern and conform to recent legislation[rdquo] & to [ldquo]improve the clarity of policies and procedures[rdquo] are noble. I am happy to work with you to these purposes.

Reviewing the Rangeland Management Directives purpose for providing USFS managers and Livestock Operators a key guiding document for grazing of NFS lands requires a look at the history of how the National Grasslands were formed. Regarding the Buffalo Gap & Ft Pierre National Grasslands, these were L-U projects formed with land acquired from private citizens during the Great Depression and administered under local grazing associations (incorporated in South Dakota) and the SCS utilizing the Bankhead-Jones Act of 1937. Many of the National Grassland allotments have private land interspersed with the NFS land and are operated under the FS Rangeland Management Directives [ndash] meaning the allotments themselves have both private AND FS land. Questions and conflict in the operation of land formerly privately held and then reformed within the National Grasslands will continue but can and should be clearly and consistently addressed with a solid document providing guidance while still allowing the range management professionals at the FS to utilize their good judgement.

Major items causing strife for the USFS managers and Livestock Operators come from the term [ldquo]multiple use[rdquo]. There is only one commercial use of Grasslands in South Dakota and that is grazing. This does not imply that grazing is the only good use of the land. Additionally, any use of the land requires an eye towards conservation and true sustainability. Any other way is short-sighted. Many of the ranching families utilizing FS lands have done so for generations and have record of the sustainable production of this same land grazed as a L-U project since the late 1930s and then the USNG up to present day. Ability to manage for changing range conditions such as drought (reduced forage), heavy precipitation (abundance of clover or brome) and fire on a timely basis allows for conservation and true sustainability. This has been proven among the ranching families who have grazed this land for generations. Another point to consider regarding these long time ranching families, they were the people who cleaned up the homestead sites on the grasslands, picked up the buildings/wire scattered over prairie and built improvements such as perimeter & cross-fences, stock dams and later, water pipelines & tanks. These improvements all make the efficient and sustainable grazing of livestock and wildlife possible.

Ability to manage for changing range conditions on a consistent basis with local FS managers reviewing with the Livestock Operators consistently making timely adjustments is a welcome change. Recently (2016 to present) we have seen better cooperation and fewer ill-advised boon-doggles such as controlled burns on the grasslands, the fencing out of stock dams to create wildlife refuges or fencing out of draws to improve woody brush eco-systems. Fire on heavy fueled areas in a high wind is not

controllable. Forage, trees, brush and wildlife ebb and flow with many complex environmental factors and there are no fencing or grazing shortcuts to make lasting change. In short, there are good years and bad, when the draught is over the native grass comes back. Boon-doggles do real economic damage to ranching families and still do not have lasting effects on the conservation or sustainability of the land.

Some items I like:

1. Clarifying multiple-year CPs. Water distribution pipelines, stock dams and fencing sometimes require multiple year projects.
2. Clarification on multigenerational family allotments. I like it. Make clarification about stepchildren/grandchildren.
3. Chapter 10 & 20 historical documentation of Homestead Acts, Bankhead-Jones Title III, Grazing Associations, L-U projects, and National Grasslands. This is an immensely helpful and useful section for all citizens to understand our shared national history as it pertains to livestock grazing in western states.

Some items of concern either I did not like or did not see addressed in the Rangeland Management Directives Updates:

1. First statement is grazing is a privilege and not a right. The US government is by declaration [ldquo]of by and for the people[rdquo] (citizens). Cattlemen are the particular citizens who historically did not abandon these grasslands during times of economic and environmental strife. We don[rsquo]t need a [ldquo]thank you[rdquo] but continual negative expectation is not helpful. Much care is taken to explain how this [ldquo]privilege[rdquo] can be taken away. Careful review every ten years of a Grazing

Association[rsquo]s permit by the NFS is prudent management but treat us like adults. Plainly state

that if we maintain good stewardship of the resource, grazing will go on in perpetuity.

1. Utilizing County CIS maps to provide recreational users accurate information for the enjoyment of the Grasslands. Creek crossings, stock dams and water tanks are not consistently and accurately identified. For example, more than half of the land shown as Buffalo Gap National Grasslands in eastern Fall River County of SD is in fact deeded private land and not part of the BGNG. Also, the trails allowing access are not clearly identified on the map. It makes public adherence to the travel policy almost impossible. It makes property security for private landowners who neighbor National Grasslands exceedingly difficult. Taxpayers already pay for the county CIS maps [ndash] we need to use them.
2. Consistency between grazing allotments administered thru a local grazing association or administered on an individual basis. SDSGA has members who belong to local grazing associations and members who have individual allotments. There is much more flexibility for the members with individual allotments to increase grazing pressure for a short period (weeks) to reduce fire danger and utilize short season plants like sweet clover and brome. Work with the Grazing Associations on NEPA requirements to utilize established grazing practices to best

utilize forage and do not tie the hands of the District Rangers to make adjustments. We need our DR to have the authority to increase numbers temporarily and not just cut numbers.

Leaving a good amount of cover in a pasture provides mulch, anything more than good cover is called fuel.

1. No mention of the [ldquo]Angus McIntosh, PhD[rdquo] issues of allotment ownership in the webinars, but plenty of additions in the handbook. Was your intent to inform or to warn and back the cattleman off?
2. Several references to dealing with estray and unbranded livestock. What about bison? Cattleman are required to own the brand and cattle for their allotment. Bison ranchers should do the same. Grazing livestock not owned by the permitee is a major offense and one of the big four (16.41) Serious Offenses that Warrant Immediate Permit Cancellation.

This document serves as comment to the USFS 18-Dec-2020 Rangeland Management Directives Updates. The USFS stated goals of [ldquo]more usable, modern and conform to recent legislation[rdquo] & to [ldquo]improve the clarity of policies and procedures[rdquo] are noble. I am happy to work with you to these purposes.

Reviewing the Rangeland Management Directives purpose for providing USFS managers and Livestock Operators a key guiding document for grazing of NFS lands requires a look at the history of how the National Grasslands were formed. Regarding the Buffalo Gap & Ft Pierre National Grasslands, these were L-U projects formed with land acquired from private citizens during the Great Depression and administered under local grazing associations (incorporated in South Dakota) and the SCS utilizing the Bankhead-Jones Act of 1937. Many of the National Grassland allotments have private land interspersed with the NFS land and are operated under the FS Rangeland Management Directives [ndash] meaning the allotments themselves have both private AND FS land. Questions and conflict in the operation of land formerly privately held and then reformed within the National Grasslands will continue but can and should be clearly and consistently addressed with a solid document providing guidance while still allowing the range management professionals at the FS to utilize their good judgement.

Major items causing strife for the USFS managers and Livestock Operators come from the term [ldquo]multiple use[rdquo]. There is only one commercial use of Grasslands in South Dakota and that is grazing. This does not imply that grazing is the only good use of the land. Additionally, any use of the land requires an eye towards conservation and true sustainability. Any other way is short-sighted. Many of the ranching families utilizing FS lands have done so for generations and have record of the sustainable production of this same land grazed as a L-U project since the late 1930s and then the USNG up to present day. Ability to manage for changing range conditions such as drought (reduced forage), heavy precipitation (abundance of clover or brome) and fire on a timely basis allows for conservation and true sustainability. This has been proven among the ranching families who have grazed this land for generations. Another point to consider regarding these long time ranching families, they were the people who cleaned up the homestead sites on the grasslands, picked up the buildings/wire scattered over prairie and built improvements such as perimeter & cross-fences, stock dams and later,

water pipelines & tanks. These improvements all make the efficient and sustainable grazing of livestock and wildlife possible.

Ability to manage for changing range conditions on a consistent basis with local FS managers reviewing with the Livestock Operators consistently making timely adjustments is a welcome change. Recently (2016 to present) we have seen better cooperation and fewer ill-advised boon-doggles such as controlled burns on the grasslands, the fencing out of stock dams to create wildlife refuges or fencing out of draws to improve woody brush eco-systems. Fire on heavy fueled areas in a high wind is not

controllable. Forage, trees, brush and wildlife ebb and flow with many complex environmental factors and there are no fencing or grazing shortcuts to make lasting change. In short, there are good years and bad, when the draught is over the native grass comes back. Boon-doggles do real economic damage to ranching families and still do not have lasting effects on the conservation or sustainability of the land.

Some items I like:

1. Clarifying multiple-year CPs. Water distribution pipelines, stock dams and fencing sometimes require multiple year projects.
2. Clarification on multigenerational family allotments. I like it. Make clarification about stepchildren/grandchildren.
3. Chapter 10 & 20 historical documentation of Homestead Acts, Bankhead-Jones Title III, Grazing Associations, L-U projects, and National Grasslands. This is an immensely helpful and useful section for all citizens to understand our shared national history as it pertains to livestock grazing in western states.

Some items of concern either I did not like or did not see addressed in the Rangeland Management Directives Updates:

1. First statement is grazing is a privilege and not a right. The US government is by declaration [ldquo]of by and for the people[rdquo] (citizens). Cattlemen are the particular citizens who historically did not abandon these grasslands during times of economic and environmental strife. We don[rsquo]t need a [ldquo]thank you[rdquo] but continual negative expectation is not helpful. Much care is taken to explain how this [ldquo]privilege[rdquo] can be taken away. Careful review every ten years of a Grazing

Association[rsquo]s permit by the NFS is prudent management but treat us like adults. Plainly state

that if we maintain good stewardship of the resource, grazing will go on in perpetuity.

1. Utilizing County CIS maps to provide recreational users accurate information for the enjoyment of the Grasslands. Creek crossings, stock dams and water tanks are not consistently and accurately identified. For example, more than half of the land shown as Buffalo Gap National Grasslands in eastern Fall River County of SD is in fact deeded private land and not part of the BGNG. Also, the trails allowing access are not clearly identified on the map. It makes public adherence to the travel policy almost impossible. It makes property security for private landowners who neighbor National Grasslands exceedingly difficult. Taxpayers already pay for the county CIS maps [ndash] we need to use them.
2. Consistency between grazing allotments administered thru a local grazing association or administered on an individual basis. SDSGA has members who belong to local grazing associations and members who have individual allotments. There is much more flexibility for the members with individual allotments to increase grazing pressure for a short period (weeks) to reduce fire danger and utilize short season plants like sweet clover and brome. Work with the Grazing Associations on NEPA requirements to utilize established grazing practices to best

utilize forage and do not tie the hands of the District Rangers to make adjustments. We need our DR to have the authority to increase numbers temporarily and not just cut numbers.

Leaving a good amount of cover in a pasture provides mulch, anything more than good cover is called fuel.

1. No mention of the [ldquo]Angus McIntosh, PhD[rdquo] issues of allotment ownership in the webinars, but plenty of additions in the handbook. Was your intent to inform or to warn and back the cattleman off?
2. Several references to dealing with estray and unbranded livestock. What about bison? Cattleman are required to own the brand and cattle for their allotment. Bison ranchers should do the same. Grazing livestock not owned by the permitee is a major offense and one of the big four (16.41) Serious Offenses that Warrant Immediate Permit Cancellation.