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RE: South Otter Project

Forest Service Personnel:

We have reviewed the South Otter Restoration and Resiliency Project on the Ashland District of the Custer Gallatin National Forest. As allotment holders on this forest unit we are pleased to see a project to improve forest resiliency and provide biological and structural diversity as well as reducing fuel loads and reducing the risk of large-scale wildfire. These are important aspects of the health of the Ashland District and the continued economic health of the Ashland area including Rosebud and Powder River Counties. Itemized below are the several comments which we request you to carefully, thoughtfully and fully consider prior to proceeding with this project.

\*The Ashland District manages one of the largest national forest livestock grazing programs. It is imperative that this plan be consistent with the new Custer Gallatin Forest plan that will direct management for the next 20 years on the Ashland District. Additionally, the Range Management Directives are nearing completion and will revise the management activities of the grazing programs on the District. The previous Forest Plan and Management Directives are out of touch with current directions and goals of the National Forest and have outlived their usefulness in guiding current forest plan direction. To implement a new program as significant as the South Otter Project as these soon to be replaced guiding documents expire should be reconsidered. Is the South Otter Project consistent with the proposed Forest Plan and Range Management Directives that the FS plans to adopt in the near future? What are the discrepancies and how will these be addressed in the plan implementation?

\*The Resiliency Project describes several desired conditions taken from the Draft Forest Plan (scheduled for adoption in early 2021) yet does not address the grazing component which is an important economic and lifestyle issue. (Draft Forest Plan: The Ashland and Sioux ranger districts manage two of the largest national forest livestock grazing programs. Family owned ranches within the national forest boundary and livestock grazing on public lands are an important component of the backdrop and culture of the rural communities surrounding the national forest areas.) We request that this Landscape project for the Ashland District address the impacts and benefits of burning and thinning the forest components. For instance, how will prescribed burns and wildfires (allowed to be considered prescribed burns) be managed to avoid or minimize impacts to grazing allotment rotations. What benefits to the ecosystem in vegetation production will result from the implementation of this plan? How will the enhanced wildlife habitat impact the grazing allotments? What impacts, both short term and long term, will occur as a result of these proposed activities on the existing allotment grazing programs?

\*The Proposed Forest Plan Desired Conditions (FW-DC-FIRE) 02 Vegetation conditions (composition, structure and function) support natural fire regimes except in the wildland-urban interface and adjacent to infrastructure where vegetation conditions support low-intensity fire where necessary in order to reduce negative impacts to values at risk. Are the Wildland-Urban interfaces (WUI) mapped for the South Otter project? How will WUI impacts be managed, mitigated or avoided by the implementation of the project activities? How will the proposed actions avoid detrimental impacts to values at risk from wildland fires?

\*The Proposed Forest Plan Desired Conditions states: (FW-DC-SUS) 01 Key forest resources, products, services, and opportunities including clean air, clean water and aquatic ecosystems, terrestrial ecosystems, education and volunteer programs, flood control, infrastructure, forest products, mineral and energy resources, historic, cultural, tribal or archeological sites, geologic features, grazing, scenery, recreation, spiritual inspiration, opportunities to experience peace, quiet and solitude in nature, free roaming wildlife, and designated areas (including their intrinsic values), contribute to the well-being, quality of life, mental, physical and spiritual health, and safety of the public. And FW-DC-SUS 02 provides for sustainable levels of forest provided goods and services (such as wilderness, fish and wildlife, livestock grazing, recreation opportunities and access, timber, minerals, energy resources, infrastructure, etc.) are available and contribute to the social, cultural, and economic sustainability of local communities. The flow of these goods and services align with existing and emerging industries, growing and vulnerable populations, and overall economic conditions of forest communities. FW-DC-SUS 03 Ecosystems structures and functions provide for clean air and water; desirable recreation and tourism opportunities; forest products; livestock forage; plant and animal food supplies, carbon sequestration, water storage; and mineral and other energy resources. How will these desired conditions be achieved with planned fire program that will introduce up to 293,000 acres of intentionally started prescribed fire over a 10-20-year timeframe. To achieve this acreage goal 10,000-29,000 acres per year will require treatment. These burn areas are significant in size, some approximating the entire acreage of one grazing allotment. How will air quality be impacted by annual burns of such large fires? What are the impacts to the quality of life benefits described in the desired conditions, were these life benefits considered in the development of the plan?

\*The management of wildfire is a program that is continuing to evolve with the massive fires that have consumed millions of acres of beautiful forest in the western US during the past decades. The use of prescribed burns, thinning and commercial cutting are all valuable tools to reduce and minimize the impacts of burns. However, targeted livestock grazing, separate from the allotment grazing program, is coming to be recognized as an additional tool that can be used to manage timber resources. Livestock grazing does not carry the risk of a burn escaping the desired prescribed burn area and threatening adjacent resources or contributing to particulate air pollution. The Ashland District has a competent staff of grassland management personnel and a targeted grazing program should be an integral component of a Landscape Restoration and Resiliency Project. The plan should consider and describe how this important aspect of wildfire management is intended to be utilized during the project.

The Ashland Fort Howes members are the backdrop and culture of the rural communities. We ask that you address these concerns in the final project. Thank you for the opportunity to submit these comments on the proposed plan.

Sincerely.

Jackie Walden  
President

Powder River County Commissioners  
Rosebud County Commissioners  
US Congressional Delegations