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Comments: South Otter Restoration and Resilience Project

Comments of the Ashland Fort Howes Grazing Association

These comments are offered on the proposed South Otter Project. We trust that the Forest Service will evaluate and implement these comments into the final project to enhance the economic value of the project as well as provide benefits to the Ashland community as well as to Powder River and Rosebud Counties.

This project appears to be solely beneficial to the logging industry in South Dakota and secondarily designed to enhance elk habitat. There is a negative financial value to the project according to the economic analysis. This document does not present a timeline for activities nor a completion date. This plan as proposed would give the Ashland District the ability to conduct a prescribed burn at any time as they so choose. This does not give the public the opportunity to offer specific comments on their intended activities. In fact, it absolves the district office of responsibility of any adverse impacts as 'the plan was approved in 2022.' With no completion date the District office could be still utilizing this plan based on 2022 and earlier technology to operate in 2070 or even later! (Personal conversation, R. Hecker 2022) This type of plan authorization is totally out of the scope of any intended authorization under the Environmental Analysis or EIS process and for that reason must be sent back to the planning team for proper development.

There is no discussion of the impacts to the agricultural community, either by displacement during the timber harvest projects, no discussion as to how timber regrowth can be controlled by livestock grazing, no discussion as to use of increased vegetation growth to increase range conditions of forage or utilization of that forage by livestock to reduce the fuel load thus preventing or reducing the intensity of unplanned wildfire. For all of these reasons we believe this project is inadequate and must be redeveloped with input from both the agriculture community and the Montana FWP.

#### Agriculture and Grazing Impacts:

The 2022 Forest Management Plan recognized the importance of grazing on the Ashland District. This proposed project briefly notes that grazing is beneficial but avoids significant discussion about grazing impacts and benefits to the community. The desire to continue profitable grazing programs for the local community is of utmost economic and environmental interest. This project should emphasize designing timber reduction plans to increase the number of AUMs available to the Forest Allotment Owners as well as wildfire control.

The plan also notes that there will be potential impacts to livestock distribution, total forage production, range water and fences as a result of this project but does not indicate any plans or programs to increase grazing or repair or replace those damaged improvements. Depending on the allotment owner to repair project impacts, with no financial assistance results in an undue burden on the permittees and must be addressed in the economic impact. At a minimum, increased forage production should result in increased grazing allocations in consultation with the livestock managers on that unit.

If the work completed in the plan results in improved livestock distribution, then there is a concurrent reduction in usage of currently grazed areas. What is the magnitude of these impacts? Will there be rangeland analysis to determine if additional grazing is warranted in that pasture? Will there be such significant increases in vegetation that additional livestock should be utilized to reduce fuel loads instead of conducting a prescribed burn? What is the plan for post treatment benefits for agriculture?

Wildlife Impacts: At present the Montana FWP estimates there are about 3500 elk in the Ashland District of the CGNF. Their stated target population number is 900. (Personal communication, fall 2022). Efforts by the Forest Service to increase elk habitat are unwarranted and out of step with the FWP programs and should not be one of the primary goals of this project. The plan states that there will be 'some displacement' of elk to the private lands during harvest operations but offers no description of the impacts or how they will be mitigated. Elk on private

lands can be very detrimental to fields and crops as well as to fences and water improvements. Elk displaced to private land in the summer before crop harvest can result in complete loss of the crop. This especially impacts grain crops that are periodically used in alfalfa field restorations. The timing and duration of specific projects adjacent to private land must be adequately evaluated and included in this project.

While reduction of wildfire fuels is important it is also critical to consider the impacts at the local level. Wildfire fuel levels can also be reduced by livestock grazing after the fuel thinning projects are completed. Increased elk habitat and no increase in AUMs is a one-sided presentation that benefits wildlife only at the expense of the residents of the impacted area. For these reasons, the Grazing Association requests that the Forest Service redesign this project to include expanded livestock utilization of the treated areas as well as establish a timeframe for completion of the proposed projects included in this overall plan.

Thank you very much.

Ashland Fort Howes Grazing Association

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