

**Ashland Fort Howes Grazing Association  
180 Sonnette Road  
Broadus, Montana 59317**

**DRAFT REVISED FOREST PLAN-CUSTER GALLATIN NATIONAL FOREST  
March 2019 Draft Forest Plan**

The following comments on the Custer Gallatin National Forest (CGNF) 2019 Draft Revised Forest Plan (Draft Plan) are respectfully submitted by the Ashland Fort Howes Grazing Association. The Association membership includes all permittees on the Ashland District of the Custer Gallatin National Forest.

The Association thanks the CGNF for considering our comments submitted on the proposed draft plan, and for incorporating a number of these comments into the March 2019 Draft Plan. We trust that these comments will also be incorporated into the final Custer Gallatin Forest Plan.

1.5.1 Other Required Plan Content Social and Economic Characteristics

We respectfully request the addition of the following text in the second paragraph after the sentence ending with 'livestock grazing programs.' Please add: **Family owned ranches within the forest boundary and livestock grazing on public lands are an important component of the backdrop and culture of the rural communities surrounding the forest areas.**

2.3.6 Riparian Management Zones

There is a lack of clarity and consistency between this riparian standard, the draft EIS comments and the Permitted Livestock Grazing Section 2.4.5.

The final plan must use appropriate and regionally developed science for establishing useful and applicable standards of riparian area utilization. The draft EIS references the limiting of livestock grazing based on a minimum end of season stubble height that is not an ecologically acceptable standard for the Ashland and Sioux districts. The Goss and Roper (2018) studies were not completed in the northern Great Plains or pine savannas of eastern Montana and western South Dakota and do not reflect the vegetation of the region nor reflect appropriate vegetative standards for protection of riparian areas. Appropriate standards should be developed and applicable based on the ecosystem where they will be applied. Please delete the references to the minimum 4-6" vegetative heights. Appropriate standards for the eastern Montana and western South Dakota region can be obtained from the USDA Range Experiment Station in Miles City, MT or from Montana State University Extension Service.

2.3.6 Riparian Management Zones does not address this standard, however, it is clearly stated in 2.4.5 Permitted Livestock Grazing that the FS intends to utilize this standard. Since this standard is not applicable forest wide it should be deleted from 2.4.5 (Grazing) and simply stated that the 2.3.6 standards for Riparian Management apply in grazing areas.

2.3.12 Fire and Fuels

FW-GO-FIRE 02 should insert the underlined text, to read:

'The Custer Gallatin National Forest coordinates fire management actions with State, local, tribal and adjacent Federal agencies and permittees where applicable.'

FW-STD-FIRE 01 should insert the underlined text, to read:

“All wildfire shall have a management response that considers risk to life and safety, taking into account the costs and effects to resources and values at risk, including those of permitted stakeholders.”

FW-GDL-FIRE 02 should insert the underlined text, to read:

“To reduce the negative impacts of wildfires to values at risk, improve fire control opportunities, or decrease risk to fire personnel and the public, fuels treatments, including grazing, should be designed to remove or rearrange the live and dead vegetation as necessary to reduce fire intensity.”

FW-GDL-FIRE 03 should insert the following text:

“Minimum Impact Suppression Tactics (MIST) should be utilized generally as a best practice where applicable.” This requirement would remain qualified under the existing “exceptions” language.

In general, given the extensive history of fire suppression on the CGNF, we are concerned that the Forest Plan is overly focused on maintaining status quo resource conditions. While we understand that the Plan is programmatic in nature, and is not intended to present specific resource plans for each geographic component covered by the Plan, we believe that the CGNF should contain a stronger emphasis on fuels management through managed fire, mechanical treatment, livestock grazing and other approaches that may be appropriate for each targeted management area.

The following article explains one of the benefits and methodology for using livestock grazing for firebreaks and fire control <https://www.beefmagazine.com/sustainability/use-livestock-create-firebreaks>

#### 2.3.14 Invasive Species

FW-GDL-INV should be relocated as new FW-STD-INV, with “should” amended to “shall”.

FW-OBJ-INV The goal of invasive species management should be of sufficient treatment to prevent the increase of the total infested acreages on an annual basis as stated in the **Desired Conditions**. Therefore the selected alternative should reflect acreages by geographic unit that will achieve these desired conditions. **Simply slowing the rate of increased acreages of invasive species is an unacceptable management plan and does not make progress towards the goal of an invasive free forest wide condition.**

#### 2.3.15 Wildlife

While FW-DC-WL 08 addresses the “risk of disease transmission between domestic animals and wildlife”, there is no acknowledgment of the potentially serious risk livestock from interaction with bison and elk and the impacts of brucellosis.

The Plan should also focus more attention on the nexus between wildlife and domestic livestock. For instance, the provision for bison expansion into ‘suitable habitat’ should not allow for expansion adjacent to allowed and currently permitted livestock grazing permits or adjacent private lands used for livestock production due to the detrimental impacts to the private agriculture of Montana due to brucellosis disease transmission.

Additionally, the plan should add FW-DC-WL 09 New species will not be introduced that reduce or negatively impacts permitted grazing allotment AUMs.

### Big Game

Goals (FW-GO-WLBG) 01 Please revise the sentence to include the underlined text: The Forest Service engages in cooperation and collaboration with State wildlife management agencies, Tribal governments, permitted livestock allotment holders (where present) and other interested partners in the development of management strategies, including monitoring programs, to maintain suitable habitat conditions ....

### Prairie Dogs (WLPD)

**Desired Conditions 02** should be further expanded by addition of the following text: Buffer zones free of black-tailed prairie dogs should be maintained on federal lands adjacent to Non-Federal lands. Addition of this statement would be consistent with the management of black-tailed prairie dogs in the National Grasslands.

### 2.4.5 Permitted Livestock Grazing (GRAZ)

There should be a statement that permitted livestock grazing should enhance the economic and social values of the ranching/western community values, especially prevalent in the Sioux and Ashland geographic areas and we recommend the inclusion of the following text. The permitted livestock allotment holders provide beneficial values to the hunting and wildlife aspects of the forest in the maintenance of the over 1800 water facilities that have been developed in the Ashland and Sioux districts. Grazing is critical to the economic values of the communities as well as the hunting and wildlife benefits of the water developments installed to support grazing. This is consistent with the **Organic Act of 1897** which states that ‘the pasturing of livestock on public lands will not be interfered with so long as it appears that injury is not being done to forest growth.’

The Forest Service also needs to address the aging infrastructure of the water developments. Many of the pipelines have reached the end of their anticipated life and require replacement, additionally, many reservoirs need reconstruction to maintain their usefulness and stability. The FS should have a plan for providing resources address this situation. Please add the underlined text: A plan for replacement of aging infrastructure (water wells, pipelines, windmills, water tanks, reservoirs, etc.) should be developed with at least 10% replaced or rehabilitated on an annual basis.

The last paragraph of the Introduction does not include any references to grazing in areas designated as ‘backcountry’. There should be a statement that livestock grazing is an allowed activity with a reference to the appropriate guideline or Manual. This of course would not be required if there are no backcountry areas with permitted grazing allotments.

### Desired Conditions (FW-DC-GRAZ)

Add this sentence to 01 or add it as condition 04: Habitat damage by wildlife will not impact AUMs in permitted grazing allotments.

It is not clear where the grazing AUM’s are located, therefore it is difficult to determine the plan for the various alternatives. In no event should grazing AUMs be decreased in the overall plan.

#### 2.4.5 Guidelines (FW-GDL-GRAZ) 02

There is a lack of clarity and consistency between this riparian standard, the draft EIS comments and the Permitted Livestock Grazing section.

The final plan must use appropriate and regionally developed science for establishing useful and applicable standards of riparian area utilization. The draft EIS references the limiting of livestock grazing based on a minimum end of season stubble height that is not an ecologically acceptable standard for the Ashland and Sioux districts. The Goss and Roper (2018) studies were not completed in the northern Great Plains or pine savannas of eastern Montana and western South Dakota and it is inappropriate to use them for evaluating riparian zones.

Riparian Management Zones (found in 2.3.6) does not address this standard, however, it is clearly stated in 2.4.5 Permitted Livestock Grazing that the FS intends to utilize this standard. Since this standard is not applicable forest wide it should be deleted from 2.4.5 (Grazing) and simply stated that the 2.3.6 standards for Riparian Management apply in grazing areas.

Or revise:

2.4.5 FW-GDL-GRAZ 02. The use of the R1 ARCS standards from Washington state are not applicable to the Ashland and Sioux districts and should not be applied to riparian habitat forest wide. This has been previously discussed within the FS (see letter from Kim Reid to Leanne Marten, dated 8/25/17). It would be more appropriate to remove this standard in lieu of establishing a standard applicable to the regional ecosystems. Standards should be developed and applicable based on studies developed in local ecosystems.

#### 2.4.38 Inventoried Roadless Areas (IRA)

Suitability (FW-SUIT-IRA) we suggest adding the following underlined text:

04 The IRA's are suitable for grazing at currently permitted levels. In existing grazing allotments developed infrastructure (wells, springs and water tanks, etc.) may be accessed by motorized vehicle for inspection, replacement or repair of said infrastructure component.

#### 2.4.46 Backcountry Areas (BCA)

We do not support the designation of the Ashland Hiking and Riding areas (Cook Mountain and King Mountain) and Tongue River Breaks as Backcountry Areas and encourage the selection of Alternatives D or E as the preferred Alternative. We encourage the FS to retain these three areas as Inventoried Roadless.

The Draft EIS does not address all management impacts in the Backcountry section as compared to the Inventoried Roadless Area. As such the reader cannot make a comprehensive evaluation of the intent of the Forest Service and the assignment of the areas to Backcountry from Inventoried Roadless. Short such information the Forest Service is strongly encouraged to retain the Inventoried Roadless area designations as detailed in the Draft Forest Plan and delete all references to Backcountry Areas in the Ashland District.

### 3.3 Ashland Geographic Area

#### Social and Economic Characteristics

The last paragraph of this section should begin with this text: **“Coinciding with the grazing water developments by the Forest Service on the Ashland District” ...the elk herd ....**

#### Cultural and Historical Characteristics

Instead of stating that there are over 400 sites why not state the number of prehistoric and the number of historic sites. This would provide more clarity to the evaluation of the Tongue River Breaks as a study of the Breaks as a ‘traditional cultural landscape’. Additionally, it would provide an indication of the historic utilization of the area. There is no recognition of the role that ranching settlement at the turn of the 19<sup>th</sup> century played in the development of this land into the Custer Reserve and then Custer National Forest.

#### 3.3.6 Other Resource Emphasis Areas

As the permitted livestock allotment holders of the Ashland district we strongly encourage the addition of a discussion of the **‘Lands Suitable for Livestock Production’** in the Ashland Geographic Area. The suggested text is underlined and should be: “**Lands Suitable for Livestock Production**’ Lands suitable for livestock grazing are areas where terrain and vegetation are accessible to livestock. Acreages suitable for grazing is 436,124 acres in the Ashland District and it is expected that existing grazing on all allotments will continue with a minimum of 128,475 AUMs. Periodic grazing at a level greater than 50% may be used as an herbaceous plant control in lieu of prescribed burns to remove excess vegetation and reduce fire risks. The administrative improvements of pipelines, water facilities and rotational grazing programs has improved range and ecosystem health and will contribute more AUMs available for livestock and wildlife utilization. Increased AUM allocations will be determined at the allotment management planning level in consultation with the grazing permittee based on ecosystem health. Inventoried Roadless areas and Backcountry areas are suitable for livestock grazing.

AL-DC-GRAZ 01 Grazing will continue to contribute to the social and economic well-being of the local communities. (Personal communication between Powder River County Commissioners and Ashland Ranger District staff)

AL-DC-GRAZ 02 The Ashland District will continue to be managed as the largest grazing unit within the National Forest System (excluding the National Grasslands) and will continue to exemplify the multiple use resources of the forest through grazing, timber production, hunting and recreation.” (Personal communication with Ashland Ranger District staff)

#### 3.3.7 Plan Components Ashland Backcountry Areas (ABCA) Cook Mountain, King Mountain and Tongue River Breaks BCAs.

Section 2.4.46 States motorized use is acceptable in the backcountry areas. This section states it is not acceptable. We strongly recommend that these three areas remain Inventoried Roadless Areas and this section 3.3.7 be deleted from the Forest Plan.

#### Monitoring Plan

FW-OBJ-GRAZ Add a monitoring question: Is the range condition in grazing allotments in an upward trend or static condition? The indicators would be increased acreages in improved condition (Poor, Fair, Good, Excellent) by allotment and by forest determined using scientifically acceptable range analysis protocols.

Other Comments:

DRAFT EIS, Table 51 and 53 show the same information but are identified as Forest wide and Pine Savanna details. Please insert correct table as it impacts the review.