

January 25, 2010

The Honorable Tim Johnson
United States Senate
136 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Johnson:

Thanks for the opportunity to respond to your December 11 letter regarding your intent to introduce legislation to designate a portion of the Buffalo Gap National Grasslands as Wilderness. We appreciate the opportunity to provide input in an effort to alleviate our many and varied concerns. To that end, we reiterate the points made in the January 18 letter from the Black Hills Multiple Use Coalition (BHMUC).

Like the BHMUC, our organizations also question if your proposal to craft legislation that addresses concerns regarding impacts of a Wilderness designation on adjacent lands can, in fact, meet the definition of a Wilderness as outlined in the Wilderness Act. According to the Act, *"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and community of life are untrammeled by man, where man himself is a visitor who does not remain."*

In order to address our over-arching concerns regarding the impact of Wilderness designation on adjacent private lands, man must have unfettered access to ensure appropriate management of invasive species, wildlife, fire, etc. This will certainly include continued use of roads within the proposed Wilderness area in addition to man's intervention to control the potential threat to private lands.

We are also concerned about how the Wilderness designation will impact existing users, especially grazing permittees. Past experience dictates skepticism regarding the continuation of grazing in a Wilderness area for the intermediate and long terms. Likewise, we aren't confident that legislation can ensure the Forest Service will retain the ability to appropriately manage fire, wildlife and invasive species since it's almost guaranteed management activities will be challenged in court.

We echo the concerns outlined in the BHMUC letter, including the quotes from the Forest Service's review of the Norbeck Project, which includes the Black Elk Wilderness. The statements highlighted in the letter from the Coalition validate our concerns as they provide a clear picture of the Forest Service's perspective on Wilderness management. Likewise, the article included as Attachment 1 in the BHMUC letter also validates our concerns regarding litigation related to Wilderness management.

If you do move forward with the Wilderness designation, we request you incorporate the suggestions of the Black Hills Multiple Use Coalition, with particular emphasis on the following:

1. Language that ensures the continuation of cattle grazing and motorized access for grazing permittees at current levels within the proposed Wilderness designation area. In

addition, the legislation must include language that minimizes the additional layers of bureaucracy and restrictions typically associated with Wilderness areas so as to ensure grazing isn't effectively eliminated via burdensome over-regulation.

2. Exclusion of land for Wilderness designation that grazing permittees do not support.
3. Language that GUARANTEES timely and appropriate management of invasive species, wildlife, fire and other plant or animal concerns that may potentially harm adjacent public and private lands. This language must address the potential for litigation to stall or stop management activities that minimize the detrimental impact to adjacent private lands.
4. Language that specifies there will be no re-introduction of any endangered or threatened species in the Wilderness area.
5. Language that emphasizes economic sustainability for the region as a key factor in directing the Forest Service's management decisions for the proposed Wilderness area.
6. Language that establishes an advisory board with representatives from user groups, including grazing permittees.
7. Consideration of alternative designations as suggested in Senator Tester's S. 1470, the "Forrest Jobs and Recreation Act of 2009".

In summary, we oppose Wilderness designations as a permanent land management practice. However, we thank you for the opportunity for dialog and your attempts to alleviate the many and varied concerns of our members.

Regards,

Bryan Nagel, President
SD Cattlemen's Association

Scott VanderWal, President
SD Farm Bureau

Mark Tubbs, President
SD Public Lands Council

cc: Senator John Thune
Representative Stephanie Herseth Sandlin
Governor M. Michael Rounds