

Livestock Grazing

Livestock grazing on Black Hills National Forest (BKNF) is one of many significant and valid multiple uses on public land.

The Norbeck Society believes the primary goal of BKNF rangeland management program is to steward vegetation and water resources with tools, including livestock grazing, that don't degrade or deteriorate vegetation or water for all other uses.

The Norbeck Society has 8 areas of concern:

1. Grazing program is too large.
2. Rangeland management needs effective monitoring.
3. Rangeland management program is inflexible.
4. Permittees need more oversight.
5. Protect at-risk species.
6. Designate a new Botanical Area.
7. Control invasive plants.
8. Communicate to the public.



Stream degradation by livestock,
Black Fox botanical area



Stream widened by livestock,
Englewood Springs botanical area

1. Grazing program too large.

- The livestock grazing program is larger than the infrastructure required to control grazing so it can meet basic natural resource conditions and goals. For example, trees dead and down from the mountain pine beetle epidemic 1996 to 2016 destroyed and greatly degraded BKNF rangeland fencing. Rather than reducing livestock grazing to numbers that could be controlled by what fencing remained, livestock continued to be stocked at pre-epidemic levels.
- Unauthorized and trespass livestock uses continue to be observed by Norbeck Society members Forest-wide.
- BKNF must examine infrastructure and its capability to control rangeland management activities. The management activity must be curtailed to fit the controls rather than allowing unmanaged activity.



Poor fence condition,
Englewood Springs

2. Rangeland management needs effective monitoring.

- The rangeland monitoring currently used is weak and inadequate. The protocols do not have adequate design to allow notification when indicator triggers are exceeded.
- It appears that adaptive management described in project-level rangeland documents has not been employed through choice of protocols, analysis of monitoring data and incorporation of results through feedback.
- Best Available Science protocols developed by Forest Service Research are available but not used by BKNF. Rangeland management goal to merely be “moving toward satisfactory” without setting objective standards of achievement provides no confidence that rangeland management can protect natural resources in the short or long term.
- Rangeland management decisions deserve to be based on Best Available Science (such as the Robel pole protocol calibrated for residual herbage in the Black Hills and Multiple Indicator Monitoring).



Stream bank degradation by livestock, Englewood Springs

3. Rangeland management program is inflexible.

- The rangeland management program desperately needs to evolve in the direction of flexibility and resilience, and how to best deal with major changes happening now and in the foreseeable future.
- Extreme weather events due to climate change, more wildfires and fires with increased intensity and more extreme drought periods are just a few scenarios to consider. For example, a change from essentially maximum stocking of allotments on BKNF (only 5 of some 300 allotments are vacant) could provide a huge flexibility factor. Livestock cannot be managed to reduce impacts to vegetation if every allotment is committed to hosting livestock every year, whatever drought or fire or flood may come. Emergency-based management doesn't serve the interests of permittees or the best interests of natural resources on the Forest.
- The Norbeck Society wonders why grass-banking, a concept long included on rangeland management lists as a beneficial practice, is never recognized or discussed in any BKNF rangeland planning.

4. Permittees need more oversight.

- The rangeland program needs to manage permittees according to grazing regulations. Our perspective is that BKNF rangeland permit administration is lax.
- The Norbeck Society would like to see BKNF information on permit violations and consequences in the last decade.
- The current permit system lacks any opportunity for competition for grazing permits. This holds the program back from fostering innovative thinking and action that would benefit BKNF natural resources while allowing grazing.
- The BKNF job is not to support ranchers, as described in BKNF rangeland documents, but to protect and conserve vegetation, water and other natural resources for the entire American public.



Livestock trampling at Englewood Springs botanical area

5. Protect at-risk species.

- The rangeland program needs to embrace its responsibility to protect and conserve At-Risk species, both plants and animals.
- The new Forest Plan must include information and direction on monitoring plant species of conservation concern in allotments.
- The 1997 Forest Plan/Phase 2 Amendment avoided litigation on species viability by BKNF proposing forest-wide monitoring of plant species annually; extensive surveys for plant species of concern before defining project areas; and plant monitoring of plant species concerns within project areas where occurrences were not avoided by project design. As far as the Norbeck Society is aware, rangeland management does not put any effort into that last requirement.
- The Norbeck Society would like to know how the new Forest Plan will encourage rangeland management to contribute adequately to maintaining persistence of sedentary plant species of conservation concern as well as mobile animal species of conservation concern in range allotments.

6. Designate a New Botanical Area.

- The rangeland program needs to work with other parts of BKNF management to designate a new Botanical Area (BA) protecting Black Hills Montane Grasslands. This BA most likely will have to include several separate units to adequately protect high quality grasslands.
- Since every research report written on Black Hills Montane Grasslands states that the greatest risk to this plant community endemic to the Black Hills is livestock grazing, rangeland management should step forward and lead efforts toward designating appropriate areas for the BA with appropriate protections from livestock grazing and other risks.
- There are too many examples on BKNF of livestock impacts in current BAs, because rangeland management hides behind other management uses rather than controlling the effects it is causing.
- The need for Black Hills Montane Grasslands protection is included in the Norbeck Society comments on the 2022 Rangeland Management Assessment as well as the assessments for non-forest ecosystems and at-risk species.

7. Control invasive plants.

- The rangeland management program needs to work with other BKNF management areas to limit invasive species expansion.
- The old Forest Plan presents a priority-setting discussion about invasive species treatment, but it is applied to so little of the Forest that invasive species spread from all management activities continues to exponentially expand. This is a case where all multiple uses/users need to collaborate on emphasizing prevention (i.e. limiting disturbance) rather than treatment.
- Timber harvest may be a primary cause of disturbed ground for invasive species but livestock are without a doubt a primary vector for spreading invasive weeds and seeds throughout the Forest.
- The Norbeck Society witnessed a landmark low point when the Black Hills Resilient Landscapes (BHRL) Project NEPA document stated that there was no way that the large invasive species load caused by the project could be effectively treated. The question arises again – why is BKNF setting management activities in motion it cannot control?
- BKNF needs to get back to a reality of responsibility where the scope and size of management activities are within BKNF ability to implement and reach a planned outcome.

8. Communicate to the public.

- The rangeland program needs to communicate its operations, monitoring, and adaptations to the public. The Norbeck Society's experience is that BKNF rangeland management maintains its program as a "black box" to the public.
- There is a large public including members of the Norbeck Society who are interested in and observe BKNF rangeland management in their daily lives, in and around their homes, businesses and recreation areas in the Black Hills.
- The public should be invited to participate in citizen science to gather monitoring data and information that BKNF continually asserts is impossible for them to collect themselves given current staffing levels. There is an abundance of labor and intellect available for BKNF rangeland management to solicit.



Tree fallen on temporary fence,
Englewood Springs botanical area