



SOUTH DAKOTA FARM BUREAU®

2225 Dakota Ave. S. • Huron, SD 57350

July 25, 2023

Jack Isaacs
Forest Supervisor
Nebraska National Forest and Grasslands
United State Department of Agriculture
Forest Service
PO Box 425
Wall, South Dakota 57790

Re: Permanent Closure - Prairie Dog Hunting, Conata Basin, Buffalo Gap National Grassland, #NP-3635

The South Dakota Farm Bureau Federation is South Dakota's largest general farm organization representing 12,000 family farmers and ranchers. The objectives of the South Dakota Farm Bureau Federation are to promote agriculture, preserve the environment, and to promote the economic, social, and educational interests of its membership. The South Dakota Farm Bureau Federation is dedicated to the preservation of South Dakota's vast grasslands for grazing and other production uses. Our goal is to build a sustainable future that has safe and abundant food, fiber and renewable fuel for our nation and the world. The livelihood of farmers and ranchers depends on healthy and diverse ecosystems. We support the Forest Service's underlying goal of addressing healthy and vibrant ecosystems. Unfortunately, the Forest Service's proposed implementation of a permanent ban of prairie dog hunting overlooks the consequences for farmers and ranchers as the managers and owners of nearby and adjoining property.

The Forest Service should withdraw this proposed rule as urged by the South Dakota Farm Bureau Federation. Farmers and ranchers in South Dakota rely heavily upon the raising of cattle and other livestock for their livelihood. The grasslands in southwestern South Dakota supply the soil and climatic conditions to make this area particularly well-suited for livestock production. Livestock production is a predominant economic force in this region. The United States has also encouraged the growth of the livestock industry by permitting grazing on the vast federal land holdings in South Dakota. Additionally, research has showed that increased populations of prairie dogs results in decreased weight gain for livestock productions: A negative effect on the local and state economies.¹

Instead of placing a permanent ban on prairie dog hunting, the Forest Service should examine the consequences of limited prairie dog hunting. Previous amendments to the 2008 Nebraska National Forest Land Use Management Plan (NNFLRMP) allowed management of prairie dogs in the Buffalo Gap National Grassland; however, management in the Conata Basin was and still is prohibited.² This prohibition resulted in increased prairie dog populations and an explosion of the sylvatic plague which

¹2021. Agriculture Research Service. Truce Between Prairie Dogs and Livestock Farmers. Retrieved from: [Truce Between Prairie Dogs and Livestock Farmers?](#)

²2008. United State Department of Agriculture Forest Service. Nebraska and South Dakota Black-tailed Prairie Dog Management on the Nebraska National Forest and Associated Units. Retrieved from: [Nebraska and South Dakota Black-tailed Prairie Dog Management on the Nebraska National Forest and Associated Units](#)

substantially reduced the prairie dog population. Furthermore, the sylvatic plague not only reduced the prairie dog population, but also decimated the existing black-footed ferret population. The federal government should also be clear in its support of farmers and ranchers by allowing sound management techniques that allow for the control of prairie dog populations on private property and leased federal lands. For example, imposing a permanent ban disregards the standing precedent of evaluating environmental conditions based on sound science. As published in the 2008 NNFLRMP, the reduction of vegetation, exacerbated by ongoing drought can influence prairie dog expansion and increase the potential for soil erosion. Prairie dogs combined with drought of varying intensities can suppress plant growth, bare soil, and the potential establishment of noxious and invasive species.³ Further, the Forest Service should continue to conduct its own research, and support research conducted by others to develop and enhance management technologies as well as reliable analytical methods.

Agriculture is South Dakota's number one industry. Requiring farmers and ranchers to be responsible for damage succumbed to their private property or federally leased ground from migrating prairie dogs would place an undue burden upon South Dakota's economic driver. Prairie dogs from state, federal, or private lands migrate from one jurisdiction to another without regard to boundaries. This migration is one of the leading reasons why in the 2005 and 2008 Nebraska National Forest Land Use Management Plan (NNFLRMP) Amendments, a buffer zone was designated along the boundary of the 3.63 Management Areas. This buffer zone protected private property from migrating prairie dogs.

As the largest landowning sector of South Dakota's economy, farmers and ranchers have experienced more potential damage to their livelihood than any other sector of the economy. Unlike other sectors, farmers and ranchers are not able to pass along higher costs. Furthermore, the permanent ban does not provide a way for farmers and ranchers to recover the value of their economic losses created by the potential migration of prairie dogs that they did not "cause." The State of South Dakota does offer some assistance in encroachment; however, even with assistance, damage can still occur to private property.⁴ Overall, this rule has no ability to compensate or protect loss of agricultural land value because it does not provide a claim for economic damage recovery.

South Dakota's farmers and ranchers are committed to conserving South Dakota's grasslands and wildlife. For this reason, it is paramount to understand that South Dakota's farmers and ranchers do not seek eradication of every prairie dog in southwestern South Dakota. Nor are they insensitive to the plight of the black-footed ferret. Our members believe it is the responsibility of the federal government to meet its management and administrative responsibilities toward the lands they hold in trust.

Thank you for the opportunity to provide comments on this issue.

Sincerely,



Scott VanderWal, SDFB President



Krystil Smit, SDFB Executive Director

³2008. United State Department of Agriculture Forest Service. Nebraska and South Dakota Black-tailed Prairie Dog Management on the Nebraska National Forest and Associated Units. Retrieved from: [Nebraska and South Dakota Black-tailed Prairie Dog Management on the Nebraska National Forest and Associated Units](#)

⁴2022. South Dakota Game, Fish, and Parks. Prairie Dog. Retrieved from: [Prairie Dog Control](#)