



February 2, 2010

Greg Mumm  
Executive Director, BlueRibbon Coalition  
909 Farlow Avenue  
Rapid City, S.D. 57701

The Honorable Tim Johnson  
United States Senate  
136 Hart Senate Office Building  
Washington, D.C. 20510-4104

RE: Proposed Wilderness legislation for lands in Buffalo Gap National Grasslands

Dear Senator Johnson,

Thank you for conscientiously taking the time to consider input prior to introducing legislation to designate lands as Wilderness located in the Buffalo Gap National Grasslands (BGNG).

The BlueRibbon Coalition (BRC) is a nationwide organization representing 600,000 motorized recreationists, equestrians, mountain bike enthusiasts and resource users. We work with land managers to provide recreation opportunities, preserve resources and promote cooperation with other public land users.

Many of our members and supporters live in and/or recreate in South Dakota and use motorized vehicles, including off highway vehicles, to access Forest Service managed lands throughout South Dakota, including those managed by the Nebraska National Forest and Grasslands. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation, mountain biking, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. BlueRibbon's members and supporters have concrete, definite and immediate plans to continue such activities in the future.

As the Executive Director of the BlueRibbon Coalition and lifetime resident of the great state of South Dakota, I bring an important perspective on behalf of this large contingent of recreational enthusiasts on the issue of the Wilderness designation in general, and uniquely, as it relates to designating these lands in the BGNG as Wilderness. I have followed and been personally involved in the many planning and management activities in the BGNG for many years.

Based on this firsthand knowledge of the area and my familiarity with the longstanding proposal

for this Wilderness designation by a special interest group, I admit that I struggle to understand the need, as do a great many others, including the general public and many political leaders from county to state and federal level. I suggest that a broader scope of input is needed to determine the actual level of need.

To that end, I would like to offer to assist your office in coordinating a public hearing on the issue at a suitable location in Western South Dakota. At that same time, I believe it would be most helpful to arrange a field trip to the area including you and/or your staff, other political and legislative leaders and/or staff from South Dakota, the NNF Supervisor and her key staff, along with stakeholder leadership.

My earnest hope in to coordinating this public meeting, along with providing the attached comments, is that you have the fullest measure of information with which to make the challenging decision that will have such a far-reaching and long-lasting effect on the land in question.

With the utmost sincerity,

A handwritten signature in blue ink, appearing to read 'Greg Mumm', with a large, stylized initial 'G' at the top.

Greg Mumm  
Executive Director

**Comments for consideration by Senator Tim Johnson concerning the proposed legislation to designate 40,000-50,000 acres of land as Wilderness in the Buffalo Gap National Grasslands (BGNG) currently managed by the Nebraska National Forest in South Dakota:**

First and foremost, I offer the following comments with all the conviction of a native born son of western South Dakota interested first in the welfare of its land and of its people. I believe it is essential that all parties step out of their traditionally centric advocacy because what is at stake here goes well beyond the narrow-minded focus of any single interest group.

In this regard, I am sure that you are well aware that proponents for designating this area as Wilderness seek to frame themselves as a “broad coalition of affected parties” who are concerned with creating a “lasting legacy for a pristine and unique environment.” Along with this, they express that they are very concerned with “the interests of those most affected such as the ranchers and grazing permittees.” The proponents are quick to describe their “willingness to compromise” and/or to point out the “significant compromises” they have already made in the development of this proposal.

I would advise you that while all this may speak to glorious aspiration, in reality, it also carries the potentially grave consequence of condemning both land and keeper to a pale and empty future.

In the interest of open and frank discussion, I am compelled to point out the obvious in that there are more stakeholders in this issue than just the “broad coalition” of proponents pushing this proposal. For example, there are those I represent who are equally described as a “coalition,” but opposed to this Wilderness proposal. Frankly, I don’t think it is fair to describe either of those two coalitions as “broad.” We are, in all honesty, “special interest” coalitions. This is especially true when speaking of the general public and the “broader” stakeholder groups affected by the proposal. Further, while both “special interest” coalitions wish to lay claim to the middle ground, it isn’t so. I think it is more correct to relegate each to their respective positions as a bookend at each end of the shelf. Ultimately, what is in the best interest of the land and the good people of South Dakota is certain to be found somewhere in between the two.

I am also obliged to say from my perspective as one bookend; all of the stakeholders are not and have never been “at the table” in any real sense of the phrase. The singularly polarized nature of the proponent coalition has historically precluded any meaningful collaboration with the broader stakeholders. Compromises they claim are those they have accomplished only amongst themselves—like the changing of a handkerchief from one pocket to another.

The groups I have been involved with who have tried meaningful discussion to a worthy end with this proponent “coalition” have been met with absolute unwillingness to depart in any way from the myopic focus of their mission to get a grasslands area—any grasslands area—designated as a Wilderness. Would the willingness have been otherwise, that is to say, had they come with a mind toward collaborating with ALL stakeholders’ interests at heart, you would assuredly be deciding on an entirely different potential bill to introduce, if any at all.

It is with the utmost respect that I proffer that one measure of the evidence of this is found in the research conducted on behalf of yet another coalition that I contend more accurately represents those most affected by this issue, the Black Hills Regional Multiple Use Coalition (BHRMUC). In that research, interviews were conducted with as many of the rancher/grazer interests affected by this proposal as could be diligently contacted. The discovery was that for each rancher/grazing permittee found to be in favor of this Wilderness proposal, there are another three that are opposed. This is a truth that is being ignored in all of this—a deaf ear turned and a story not told.

Along with many others whose families have a long history in the area and are directly affected by this issue, rancher/grazer, Scott Edoff, is one such opposed to this proposal. I have personally sat with Scott and his wife, Veronica, to study the historical documents he has from his father and his grandfather. This was a most enlightening exercise that I would encourage you to do as well. It made me realize the real significance of what this Wilderness proposal seeks to undo. It is well beyond our special interests of recreation and those of the proponent coalition. In the absence of you having his contact information, I would be happy to make those connections with your office.

The documents, which date back to the 1930s, illustrate a representative history of how the “pristine and unique environment” of the lands in question actually came to be what they are today. They tell the 70+ year story of how the men of the land and their government carved the vibrant and healthy ecosystem of today out of a virtual wasteland. The very thought of proposing that the federal government now supersede that successful active management plan with a Wilderness designation and thereby recreating the wasteland is mind boggling.

In addition, there is the history to discover directly from Darryll Peterson, still living in the area, whose hands and feet worked the controls of his bulldozer throughout that countryside, building manmade dams as water caches under contract from the government of the United States as part of that active and successful management plan.

The history here does deserve protection, but that history does not describe a land that meets the criteria of being “untrammeled by man” in the Wilderness Act. In contrast, this is land where man and his own works dominate the landscape. The history describes a government industriously intent on agricultural development and productive use, and successfully so. The grasslands from which the cattle graze are there because of all of the mechanical seeding that took place as part of that active management plan. The deer and other game that hunters wish to stalk there now are there because of that active management. If the Badlands of South Dakota had been so diligently managed and worked for as long as these lands have, today they would not be aptly called the Badlands.

Under this proposed Wilderness designation, not only will the landscape again be forever changed by the hand of man in the stroke of a pen, but people’s lives will change as well—real people’s lives. Citizens of South Dakota, whose ancestral history and hard fought means of survival are inextricably tied to that ongoing active management effort.

Yet, in the midst of this, they are falsely told the preposterous notion that somehow they stand to gain something by this Wilderness. What could that possibly be? Regardless of all the proclaimed allowances for certain types of activities in Wilderness, reality has proven time and again that those allowances can play no vital role because of the myriad of legal challenges extremist groups impose each and every time managers try to employ those allowances in Wilderness. That means that, in the end, all would be virtually thrown as dust to the wind as if a hundred years of struggle meant nothing.

I do mean to say “dust to the wind” literally. Even before that 70+ year narration from so many families like the Edoffs, it is easily verifiable that most, if not all, of these restored and actively managed grasslands were originally homesteads, purchased back by the federal government under the Bankhead-Jones Farm Tenant Act of 1937. The ruins of those homesteads and even schools still remain on the land today. That Act authorized acquisition by the federal government of those drought damaged lands with the expressed purpose of rehabilitation and use for the various purposes they are now managed and used. The catastrophic Dust Bowl of the 1930's led to the creation of the Soil Conservation Service in 1933, which was subsequently tasked to work with many of these ranchers and grazers to reseed and restore what was a wasteland. This and subsequent federal laws paved the way for establishing the National Grasslands, some of which are now actively managed by the Forest Service in South Dakota with all of the same purpose and intent.

These truths alone are evidence enough that the only protection the lands in question need are protection FROM the Wilderness designation—not the other way around as if presuming to protect these lands from the men who built it. I believe and suggest that if somehow still some sort of “protection” is deemed necessary, then most certainly an alternative to the proposed Wilderness designation must be sought. To continue forward with the intolerant “special interest” vision of a Wilderness designation in this instance would be nothing short of the equivalent audacity of proclaiming that a productive cornfield should be declared a Wilderness because of its pristine characteristics wrought by the diligent efforts of the farmer who planted it by the sweat of his brow.

This is all to say nothing of the permanent finality of the Wilderness designation which would prevent, in any way, for a similar restoration process to ever take place again should the occasion arise in the future—a distinct probability in such a dry and difficult place that would be downgraded to virtually no management under a Wilderness designation.

Instead, the focus of this decision should be on what, if any, protection is really needed for this area with ALL of the relevant information on the table and ALL of the affected parties sitting around it. If in the final analysis, it is ferreted out that protection is needed, then the focus should switch to ascertaining what the best designation to accomplish that need is.

We have the fortune of over 45 years of history to draw from since Congress first passed the Wilderness Act. All across this country, there are millions of acres that have come under the so proclaimed protection of the Wilderness designation and its well-intentioned objectives. Sadly, nearly all those “protected” lands now show the scar of failure that a permanent and non-active management prescription produces. As you well know, one doesn't have to look very far in

South Dakota but to the Black Elk Wilderness to see a perfect example of the utter failures of the Wilderness designation on our public lands.

In those 45 years since the Wilderness Act, we have grown in our knowledge and ability to protect our lands through proper management and planning. We have more alternatives that are proven to work at our disposal. It is incumbent on us to apply the knowledge and experience we have garnered from the past to meet the real needs in managing our natural resources today for the future. I implore that you to do so here in a manner that our public lands continue to be managed FOR the people instead of FROM the people. In the end, this is what Congress intended as a mission for all our federal land managing agencies under the multiple use concept of management.

Respectfully submitted by,

Greg Mumm  
Executive Director  
BlueRibbon Coalition