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Christopher Kennedy, Secretary

Laura Kelly, Governor

Dear PSICC,

First off, we would like to thank you for affording us the opportunity to provide feedback on the Grasslands Draft Assessment. The Kansas Department of Wildlife and Parks and the Cimarron National Grasslands have a longstanding close working relationship that benefits both the wildlife and the users of this unique property. The Cimarron National Grasslands is an area rich with history and that is an extremely popular destination for outdoor recreation including hunting, fishing, bird watching, hiking, camping, horseback riding, and more. We have a few comments about the assessment we offer for your consideration as you begin drafting the grasslands plan.

Since 1960, the Multiple-Use Sustained-Yield Act has tried to create balance between human needs, the environment and both consumptive and non-consumptive users. According to the 2021 USDA National Visitor Monitoring program, the Cimarron and Comanche Grasslands bring in 71,000 users annually, of which 11,219 visitors primary reason for coming was fish and wildlife related recreation. Of these visitors, 3,200 were from greater than 50 miles away. As stated above, the Cimarron National Grasslands is an important destination for recreation, and in turn is an important economic driver for the local communities. We would like the Grasslands Plan to reflect the importance of wildlife and recreation within this local community and the recreational users of the grasslands and provide them equal consideration as all the other uses of the Grasslands.

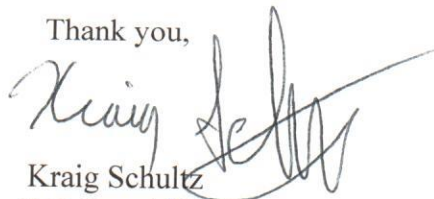
To maintain the value of wildlife and wildlife recreation on the Cimarron National Grasslands, we would like stress the importance of native habitats that support native wildlife, particularly the recruitment of young. Grasslands are one of the fastest declining habitats in North America. The Assessment frequently references grazing later into fall and winter for fuels reduction. Late season grazing can drastically reduce the amount of residual cover available for spring breeding seasons. Furthermore, with the arid and unpredictable climate in the region, the recovery of usable habitat in the following growing season is not always achievable. Mule Deer, Whitetail Deer, Pronghorn, Quail, and Lesser Prairie chicken are dependent on tall residual bunch grasses for fawning and nesting cover. Deer need cover that is at least 20 inches tall, Pronghorn need 10 inches, and Lesser Prairie Chicken need 12-15 inches of residual native bunch grasses. There are a host of other non-game species of concern with similar habitat requirements. Using these game species as umbrella species helps maintain and improve habitat for a host of other species of grassland wildlife.

KDWP would also recommend including additional species to the invasive species list that are not currently found on the Kansas Noxious Weeds list. Most nonnative invasive grasses make poor wildlife habitat. Currently on the Cimarron Grasslands there is Old World Bluestem, Smooth Brome, Bermuda Grass, Phragmites, James Galleta and a variety of Annual Bromes. Old World Bluestem is increasing in prevalence across the Cimarron, and in many locations outcompeting all native species. Galleta was planted to aid in reclamation after the dust bowl and has expanded invading large areas of the shortgrass prairie. Not only do these invasives reduce quality habitat but can also reduce the amount of quality forage on the Cimarron for native herbivores and domestic livestock alike. Ideally, resources could be devoted to eradicating these invasive species as they are found or at least managing them to prevent further spread.

In addition to the nonnative invasive grasses the Cimarron also deals with woody invasive species including Tamarisk, Russian Olive, Locust and Eastern Red Cedar. The Cimarron has been very proactive in removing Tamarisk. KDWP would recommend increased efforts to address these other woody invasive species in addition to removing Tamarisk.

KDWP would also request adding Scaled Quail to the Species of Conservation Concern. Scaled quail are well documented as having large population declines across their range and is one of the fastest declining species from a Partners in Flight analysis from 2016. Scaled quail are included in the Kansas Statewide Wildlife Action Plan as a Species of Conservation Concern. The Cimarron National Grasslands is a key stronghold for the species in the state and the only large public access to scaled quail populations. In our discussions you had them meeting indicators 2 and 3 for inclusion on the Species of Conservation Concern. Below we have included information from some key research that we feel provides evidence that Scaled Quail also meet indicators 1 and 4 and should be included as a Species of Conservation Concern.

Thank you,

A handwritten signature in black ink, appearing to read 'Kraig Schultz', with a long, sweeping horizontal stroke extending to the right.

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Indicator #1

Climate change

Climate change has been evaluated for its potential impact on North American quail species. Scaled quail distributions were predicted to shrink under all climatic models assessed. See below

"...the scaled quail (*Callipepla squamata*) was the only species predicted to lose area in climatic suitability across all three scenarios of ensemble model agreement. Our models projected future loss of areas for the northern bobwhite (*Colinus virginianus*) and scaled quail in portions of their distributions which are currently areas of high abundance." Tanner et al. 2017 see attached.

Grazing and Drought

The southern high plains is prone to climatic variability that can make agriculture and wildlife sustainability both vulnerable (Steiner et al 2018). Regional grazing strategies can dramatically influence scaled quail abundance (Williams 2018), during drought conditions continuous grazing systems have been shown to have a greater impact on quail habitat (Campbell -Kissock et al 1984). Maintaining ground level grass cover is important during drought and thermal extremes to provide protection that increases adult survival and recruitment (Cain et al 2018)

Indicator #4

restricted ecological conditions (habitat) within the plan area

Shrub cover is an important habitat component for this species (Bristow and Ockenfels 2006). Density and Distribution of tall shrub cover on CNG was found to be insufficient for scaled quail, increasing overwinter mortality and causing dispersal off CNG to neighboring properties with artificial cover (i.e. anthropogenic structure) (Washburn 2022)

Bristow, K.D. and Ockenfels, R.A., 2006. Fall and winter habitat use by scaled quail in southeastern Arizona. *Rangeland Ecology & Management*, 59(3), pp.308-313.

Cain, J., Jay Gedir, Colleen A Caldwell, and Scott A Carleton 2018. Final Report: The Effects of Climate on Scaled Quail Reproduction and Survival: USGS: National Climate Change & Wildlife Science Center.

Campbell-Kissock, L., Blankenship, L.H. and White, L.D., 1984. Grazing management impacts on quail during drought in the northern Rio Grande Plain, Texas. *Rangeland Ecology & Management/Journal of Range Management Archives*, 37(5), pp.442-446.

Steiner, J.L., Briske, D.D., Brown, D.P. et al. 2018 Vulnerability of Southern Plains agriculture to climate change. *Climatic Change* **146**, 201–218.

Tanner EP, Papeş M, Elmore RD, Fuhlendorf SD, Davis CA (2017) Incorporating abundance information and guiding variable selection for climate-based ensemble forecasting of species' distributional shifts. *PLoS ONE* 12(9): e0184316. h

Washburn, M., 2022. *Space use and survival of scaled quail in the nonbreeding season* (Master's thesis, Oklahoma State University).

Williams, K.M., 2019. *Effects of Livestock Grazing on Scaled Quail and Grassland Birds in the Marfa Grasslands, Texas*. Masters thesis, Sul Ross State University.

Zornes, M, and R. A. Bishop, 2009. Western Quail Conservation Plan. Edited by Scot J. Williamson. Wildlife Management Institute. Cabot, VT. 92 Pages.