

Data Submitted (UTC 11): 3/22/2021 6:00:00 AM

First name: Chuck

Last name: Berdan

Organization: The Wildlife Society South Dakota Chapter

Title: Chair

Comments: Dear Mr. Grant:

The South Dakota Chapter of The Wildlife Society (SDTWS) submits comments concerning the proposed Eastern Pennington Waterline Project on four allotments of the Wall Ranger District, Buffalo Gap National Grassland (BGNG). The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. SDTWS achieves this mission in part by reviewing and making recommendations on proposed actions that affect wildlife and wildlife habitats on public lands. Our Chapter goals and objectives are outlined at: <http://wildlife.org/south-dakota-chapter/>

SDTWS understands and respects the value and importance of livestock grazing and ranching in providing sustainable livelihoods and local communities. Many of our members are from agricultural backgrounds and still work on family operations. SDTWS also recognizes the importance of dependable livestock water sources and the need to protect riparian areas.

Concurrently, these are public grasslands to be managed for a diversity of land uses (Multiple Use and Sustained Yield Act) and environmental services (Bankhead-Jones Farm Tenant Act and National Forest Management Act), as articulated in the 2009 amended Land and Resource Management Plan (LRMP). SDTWS supports USFS in its mission of balanced stewardship and multiple use of the national grasslands through full and timely implementation of the LRMP. An overarching theme (desired condition) described in the LRMP is diverse and heterogeneous grassland plant communities.

Despite the draft Finding of No Significant Impact (FONSI), we are concerned that additional livestock water sources, especially in smaller pastures and during drought, could result in decreased grassland diversity over time. We agree that high grazing pressure on wooded draws and riparian areas is not proper rangeland management and is unsustainable to meet RAMP and Grassland Plan objectives. However, homogenizing native grasslands within the Northern Great Plains is a real biological diversity concern given loss of native vegetation to invasive non[shy] native species (such as the increasing episodes of yellow sweet clover in western SD), and various forms of energy development which will only continue to increase on all land ownerships.

The BGNG and project area provide habitat for grasshopper sparrows, long-billed curlews, sharp-tailed grouse, and many other grassland birds (EA pages 13-14). These species require different grassland structure and seral stages for security and cover, nesting, invertebrate food sources, and chick-rearing. The project analysis for wildlife appeared to only consider the direct impacts of installation actions including the need for escape ramps (which is critical), and possible shifting of grazing patterns due to the water installations (pages 18-19). The cumulative and connected actions of existing watering facilities plus the reasonably foreseeable future of new watering facilities within the greater landscape did not appear to be addressed.

We suggest this is an analysis oversight, leading to a pre-mature FONSI.

"Due to this minimal disturbance acreage and the predominance of the upland grassland habitat type in the area, this proposed action should have minimal cumulative impacts on wildlife species associated with the project area."

For range and invasive non-native species, the EA states:

"The cumulative effects of the Alternative are those effects caused by past, present and reasonably foreseeable future actions. The project area and its adjacent lands have historically been grazed by wildlife and livestock, been homesteaded, and farmed, treated/or noxious weeds, and been burned by wildfires. But/orthis project there is no foreseen cumulative effects."

Again, the actual analysis only looked at the installation impacts alone and historic uses, not the cumulative effects of existing, recent, and increased watering facilities across the landscape and how these changes will affect livestock patterns across a much greater landscape. There was no mention of grazing rotations (seasonal deferment, rest, continuous grazing, etc.) and how this project and other installations will continue to provide heterogeneous grasslands.

As watering developments continue to be installed for reliable water sources and better livestock distribution, we are concerned that there will continue to be more uniform grazing patterns within pastures. We are pleased to see in the EA that USFS is proposing to locate the new tanks away from critical wildlife habitats, but at the same time, the small size of some of the pastures shown in the maps makes tank placement away from these habitats problematic.

To address this concern, SDTWS recommends that the EA should have contained quantitative monitoring results of the pasture vegetation, key monitoring sites, and wildlife surveys. The EA did not contain basic information on the grazing intensities. Newer livestock watering facilities have been installed elsewhere on the District; how has vegetation and livestock grazing patterns changed since these new developments? Specifically, the EA did not discuss whether the significant wooded draws, dominated by buffaloberry and other native shrubs, which meander across much of the Wall-Quinn project area are regenerating under current grazing strategies. We recommend that these important wildlife habitats be used as key reference areas for monitoring and grazing management. Silver sagebrush habitat occurs along drainages in the South Whitewater project area and these plant communities are critical foraging areas for pronghorn, especially during severe winters with deep and prolonged snow cover. Again, there's no mention of the important sagebrush habitat in this allotment and its current condition. We recommend that the silver sagebrush habitat also be identified as key reference areas for monitoring and grazing management in the South Whitewater allotment. These recommendations are in line with LRMP Guideline F-11 that calls for livestock grazing management strategies that provide for thick and brushy understories of multi-age structure in wooded draws and thickets, contingent on local site potential. Identifying and managing these areas as key reference areas would also help promote grassland diversity in the uplands for sharp-tailed grouse (management indicator species) and other wildlife species.

SDTWS would like to take this opportunity to make an additional recommendation for future range-infrastructure proposals. LRMP guidelines F-10, 11 and 17 call for designing livestock grazing strategies during allotment management planning or as other opportunities arise for managing and enhancing important rangeland wildlife habitats. We recommend that USFS consider proposals for future infrastructure developments as an opportunity to concurrently propose and analyze, as part of the same NEPA project, adjustments in livestock grazing management for those allotments in the project area that are not being managed to LRMP and/or allotment management plan standards. We also request that USFS identify and discuss current conditions of key wildlife habitats in the project area under current grazing regimes and how those conditions relate to LRMP direction and guidance. We acknowledge that this type of valuable information was probably addressed in the Biological Assessment and Evaluation.

Please continue to include the SD Chapter of The Wildlife Society involved in all communications regarding this project.

Sincerely,

Chuck Berdan, Chair Public Lands Committee SDTWS