

Data Submitted (UTC 11): 3/24/2021 6:00:00 AM

First name: Shelly

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Organization: South Dakota Department of Game, Fish and Parks

Title: Wildlife Biologist and Public Lands Liaison

Comments: March 24, 2021

Subject Line: Eastern Pennington Waterline Project

Dear Alex,

The South Dakota Department of Game, Fish and Parks (GFP) continues its involvement in the above-reference project. The proposal is to install 6.37 miles of waterline and twelve water tanks on four grazing allotments. The purpose of the project is reported that the new tank locations and pipelines will provide reliable water sources and management of resources. I greatly appreciate you contacting me and talking about this and other projects on your District.

Upon review of the EA and FONSI, it is clear that the decision has already been made for this project. What wasn't clear in the EA is reporting of how the previous 2017 project is or is not meeting its goals and objectives, if grazing patterns have or have not changed due to new water sources since 2017, and if there continues to be a mix of grassland plant communities (although it may be too early to detect any species changes yet) and most importantly, what are the monitoring results of grassland structure (high, medium, and low heights) since the 2017 water installations? We understand that the current EA/FONSI are a different set of allotments than the 2017 project area, but demonstrating the short-term results so far of the 2017 project would lend connected actions to the EA.

The apparent lack of this comparison information (and we apologize if we missed it in the EA/FONSI) demonstrates that the analysis is also missing cumulative impacts of new water devices across a larger landscape. The greatest amount of effects analysis in the EA/FONSI were the projected impacts due to the installation of the watering sources. There was very little vegetation narrative except for some opinions that the future of these affected allotments will show less use in the riparian areas. Relieving pressure from riparian areas is always a positive step. Did the 2017 installations show this benefit to riparian areas?

As we stated in our 2017 comments, grassland heterogeneity is our biggest concern with installation of livestock watering devices across the landscape. NEPA requires that long-term implications, reasonably foreseeable actions, and connected actions, such as existing Range Allotment Management Plans and future additional watering devices be mentioned in the EA/FONSI.

In closing, we understand the Wall Ranger District has been short on staff and completing field work has been a challenge in the recent past. We hope that monitoring of all new watering devices will ensure that grazing is not homogenizing the diverse grasslands both in species composition, grassland structure, and seral stage. Continue to keep us involved in this project and others.

Sincerely,