THE WILDLIFE SOCIETY

South Dakota Chapter
Public Lands Committee
Mark Norton, Chair
2012 E. Broadway
Pierre, SD 57501
(605) 295-4190

March 7th, 2017

Kurt Pindel
Wall Ranger District
710 Main Street, PO Box 425
Wall, SD 57709

E-Mail Subject Line: Eastern Pennington Waterline Project
E-Mail Sent To: nnf_info@fs.fed.us

Dear Ranger Pindel,

The South Dakota Chapter of The Wildlife Society (SDTWS) submits comments concerning the Eastern Pennington Waterline Project on the Wall Ranger District of Buffalo Gap National Grasslands, Nebraska National Forest. The project area is south and west of Wall, South Dakota and is known for sharp-tailed grouse populations and as big game winter range in the woody draws. Breeding and fall concentration habitats for long billed curlews historically occurred in the project area as well.

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. The South Dakota Chapter achieves this mission in part by evaluating the principals involved in proposed public actions that affect wildlife and habitats. Our Chapter goals and objectives are outlined at: http://wildlife.org/south-dakota-chapter/

The SD Chapter understands and respects the value and importance of livestock grazing and ranching. Many of our members are from an agriculture background and still work on family operations. However, Buffalo Gap National Grasslands are public grasslands that have broader purposes (Multiple Use and Sustained Yield Act) than privately owned operations, as clearly articulated in the 2009 Land and Resource Management Plan (LRMP).

Our organization has an interest in this project and we submit comments based on our parent organization's (The Wildlife Society) position statement on Livestock Grazing on Rangelands in the Western U.S. This policy was established, in part, to provide a framework for publics to

work together with and appreciate public land management agencies. We believe the following items selected from the position statement pertain directly to the Eastern Pennington Waterline Draft Environmental Analysis (EA). We quote the position statement in part with emphasis added:

> *"Properly functioning rangeland ecosystems, supporting a wide diversity of native plant species, are critically important to sustaining wildlife diversity and productivity in the American West....**An ecosystem approach to rangeland management is an appropriate starting point for effective restoration and conservation of rangelands** in the West. This approach accommodates multiple uses and provides opportunity for improved wildlife-livestock interactions while restoring important resource functions and values that will help sustain viable biological and human communities....Livestock grazing is **only one** of the influences on the rangeland resource—these lands support a wide variety of uses and values. Livestock grazing is recognized as both a land use and a management tool that can be used to alter rangeland vegetation to achieve specific objectives. Land management agencies must recognize the importance of sustaining renewable western rangeland resources for the future use and enjoyment of the American public. The policy of The Wildlife Society in regard to livestock grazing on Western rangelands is to support:*
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> 1. *Implementation of livestock grazing systems and stocking rates that will improve, restore, and maintain western rangeland ecosystems.*
> 2. *Livestock grazing management on rangelands in the West that:*
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> *a. is based on **scientific studies** and considers **all rangeland resources**, trends, and interactions plus the **broad spectrum of human values and needs**;*
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> *b. provides for **adaptive management**, driven by the results of legitimate, field-based, experimental designs accepted by wildlife and statistical experts, and continued improvement of programs and practices as new knowledge and understanding of rangeland ecosystems becomes available;*
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> *c. includes provisions, support, and criteria for rangeland **monitoring;***
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> *d. involves **effective coordination** and cooperation among agencies and affected publics in developing policy alternatives, implementing policy provisions, and evaluating policy outcomes;*
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> ***e. promotes heterogeneous landscapes comprised of diverse mosaics of plant and animal communities, including the full range of native successional habitats***

*f. is based on **plans consistent with ecosystem characteristics** and with local habitat objectives for wildlife species;...*

5. *Consideration of **alternatives** to grazing, including alternate methods of vegetation manipulation (i.e. burning or mowing), or combinations of such alternatives, or grazing exclosures, to facilitate rangeland restoration....*

8. *Research evaluating the effects of **wild herbivore foraging** on western rangeland ecosystems, and the results of rangeland restoration practices designed to improve degraded plant communities in the West, especially riparian habitats.... "*

Our SD Chapter of The Wildlife Society evaluated the draft EA and believes that the contracted EA is incomplete and inaccurate for the following reasons and substantially deviates from the LRMP (Position Statement #2f). Therefore, as written the EA cannot be used to make an informed decision in line with the LRMP and should be re-drafted. It is obvious that the design work for this project is already completed (which is pre-mature) and that the project is on the fast track for unknown reasons. We request that the No Action Alternative be selected or delay the project until pertinent and additional information are made available and considered.

This project is a special use permit application to the United States Forest Service (USFS). It is alarming to us that the EA appears to have not been reviewed by USFS rangeland, botany, wildlife and National Environmental Policy Act (NEPA) specialists. We point out what we believe are major short falls of meeting minimal USFS manual and NEPA standards, and of course, the LRMP. We spent considerable time developing our comments for the USFS's Identification Team's benefit in order for the Team to develop a better alternative than the action alternatives in the draft EA. We also urge the USFS to utilize its resource experts in properly evaluating the impact of this project. We noted that the contractors do not have a certified wildlife biologist or range ecologist that developed the EA and biological assessment. The contractors appear to be unfamiliar with Council on Environmental Quality standards and NEPA; research natural areas must be maintained. We see this as a major shortcoming in a proper project evaluation.

There is minimal quantitative information and analysis presented in the EA on the effects of changes in forage utilization patterns, resulting from 11 new livestock water developments. This includes changes to seral and structural grassland diversity (by homogenizing grazing) and concurrent impacts to multiple wildlife species, represented by selected management indicator species (MIS).

Also, key rangeland and wildlife objectives, standards and guidelines in the Geographic Area direction of the LRMP were not listed or even considered in the EA process, making it impossible to claim LRMP compliance. Equally troubling and concerning are the lack of basic baseline resource information, either qualitative or quantitative, and most analysis results are presented as brief subjective and speculative statements by non-subject matter specialists.

Given more time, the USFS's own resource experts could develop one or more additional alternatives to address the suggested livestock water issue yet demonstrate compliance with the LRMP direction. New alternatives need to prescribe a broad array of rangeland benefits and values, not just benefits of better weight gain to privately owned cattle (Table 0-3). The current range of alternatives for this project proposal is very restricted and Alternatives B and C serve primarily the interests of the grazing association, not compliance with the LRMP or CEQ. To help develop an additional alternative(s), we request a new approach include basic information on current grazing systems (including rotation schedules) and maps showing the number and size of pastures and current water distribution in each of the three grazing allotments. This basic information was not made available or analyzed in the EA which is not full disclosure to the reviewing publics.

The EA repeatedly asserts compliance with LRMP direction. However, it appears that the EA contractor either avoided or was not aware of most or all the objectives, standards and guidelines contained in the Geographic Area section of the LRMP. There are specific and quantitative objectives in the LRMP for desired seral and structural vegetative conditions for this Geographic Area, yet these objectives and related standards and guidelines are not mentioned or listed in the EA. The new water sources will alter livestock grazing distribution and forage utilization patterns in pastures, yet no quantitative analysis is provided on how these changes will shift vegetation species composition and the structural mosaic of the grassland habitat for MIS and other wildlife species over time.

The Geographic Area direction includes specific direction and guidance on the desired grassland mosaic in proximity to sharp-tailed grouse display grounds, yet this too is not addressed in the EA. If this information is in the biological reports, it needs to be fully disclosed in the EA as part of the effects analysis. The USFS should have basic inventory and monitoring data that quantifies current grassland seral and structural conditions in the three allotments, and this information would support more science-based analyses to predict the impacts of the altered grazing distributions under the new water distribution. The EA makes no reference or analysis based on the locations of the current sharp-tailed grouse display grounds in the affected allotments. We request a copy or link to the USFS's MIS Specialist Report to see if the EA omissions are addressed. There is simply no way the EA contractor can claim LRMP compliance when they have not considered all the relevant LRMP direction or conducted more thorough science-based environmental analyses. **These are major flaws and omissions with the proposal and its supporting EA and will unnecessarily put the USFS in direct violation of the LRMP.**

On page 50 of the EA, a statement is made that as a result of the new water developments, **annual grazing would probably not need to be reduced during drought conditions due to available water sources.** This statement displays a poor understanding of basic range management principles and drought contingencies on the part of the contractor. This also removes the ability of the USFS to proactively manage for whatever resource values require

adaptive management (TWS Policy #2b) and LRMP compliance. We have never seen analysis of any sort by any USFS Unit that claims new water developments will avert reduction of livestock AUMs or season due to environmental conditions. Statements like this must be stricken from the EA/FONSI to protect the USFS's ability to manage public lands for multiple purposes.

The USFS already has the ability to manage due to environmental changes and should not short-change itself within one EA/FONSI on one part of the Grasslands. The drought contingencies located throughout the LRMP prescribe timely adjustments to livestock grazing during and after drought to reduce impacts on range plants and their long-term productivity and recovery following drought. Drought contingencies have little to do with water availability for livestock. **Based on this point alone, we contend that this EA is unacceptably deficient and flawed.** The EA statement also demonstrates a deliberate attempt to circumvent the drought contingencies that are in the LRMP to protect range health and productivity.

The contractors failed to consult basic science references on drought contingencies and management. Some of these references are authored by extension range scientists from South Dakota and surrounding areas. We'd be happy to provide this new information upon request.

We believe that if this proposal is implemented and completed, the stage will be set for additional future changes in grazing management and infrastructure development in these three allotments, and will be completely out of the USFS and public's purview. These future changes will likely reflect additional focus on intense grazing of permitted livestock on these allotments, rather than *broad public and environmental benefits prescribed in the LRMP.* This proposal is an example of a trend we believe is alarming - a relentless march towards a more homogeneous and developed landscape (TWS Policy #2e) on USFS public lands across South Dakota.

We want the USFS to succeed in its mission for Multiple Uses on public lands. We believe this EA cuts short the USFS's opportunity to work with *other* user groups to implement the full scope and intent of the current LRMP. Development of the current LRMP was an extensive and expensive venture and engaged a broad spectrum of agencies, organizations, users, taxpayers and interests over a period of several years. We know that increased water developments and fences on National Grasslands which lead to evenly grazed and intensively managed pastures were not the intent of the LRMP. Halting the project and offering new alternatives would acknowledge and honor the work and efforts of so many that contributed to the development of the LRMP over a long period of time. This proposal and supporting EA miss that mark.

Please continue to keep the SD Chapter of the Wildlife Society notified of all projects, including this one, on the Wall Ranger District.

Sincerely,

Mark Norton, Chair
Public Lands Committee
manorton@hotmail.com