



**THE WILDLIFE SOCIETY**  
*South Dakota Chapter*  
2012 E Broadway Ave.  
Pierre, SD 57501

September 10, 2017

Darrin Jons  
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E-Mail Subject Line:       Stony Butte Project Environmental Assessment  
Re:                                Comment deadline September 13

Dear Mr. Jons,

The South Dakota Chapter of The Wildlife Society (SDTWS) submits continuing comments concerning the Stony Butte Project Area on Fort Pierre National Grassland north of Vivian, South Dakota. Our organization has an interest in this project and we provided comments on the project area assessment and EA scoping notice. To avoid duplication, we request that our two previous sets of comments be used because our opinions on the major key issues of vegetation structure, diversity, and availability for wildlife habitat have not changed. Our SDTWS Chapter recognizes and appreciates the vital roles that agriculture plays in our local and regional communities. Many of our members came from agricultural backgrounds and/or are still an active participant in our state's agriculture industry.

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 more clearly outlined at: <http://wildlife.org/south-dakota-chapter/>

Public access for recreation, hunting, and fishing were proposed in both Alternatives 2 and 3. We support project actions, regardless of Alternative, which gives Fort Pierre National Grasslands the greatest management flexibility to accommodate these uses and still be compliant with the Fort Pierre Land and Resource Management Plan (LRMP) direction. We also support the use of prescribed fire and believe that it should be included in the final decision as a management tool when or if needed. Protection (fencing and rest from annual grazing) of a rare form of wetland, a playa, should be selected in the final decision. Intact or partially intact playas add to the overall diversity and hydrological functioning of the project area. We also support the interest and efforts of Fort Pierre National Grassland to promote native grassland diversity and decrease cool-season exotics and recognize the management challenges presented with invading vegetative species.

We commented earlier that environmental analyses should specifically address how each new water source is going to influence forage utilization patterns and resulting grassland diversity in each pasture, as it relates to the LRMP direction. The environmental analysis in this EA draft does not provide a site-specific analysis, but instead presents broad generalizations concerning how the new water developments will facilitate livestock management adjustments to favor native grassland diversity rather than specifically address site-specific cool-season exotics by pasture.

Also, we noted no reference or discussion on how new water developments relate to the drought management contingencies prescribed in the LRMP and we believe this omission should be addressed. For example, could new water developments result in extension of livestock grazing in the project area during drought, rather than timely implementation of the drought contingencies when conditions warrant? The drought contingencies in the LRMP relate to drought impacts on grassland vegetation and wildlife, not availability of livestock water.

Over the past decade, we have commented on an ever-persistent trend on federal forests and grasslands of additional pipelines and infrastructure (often facilitated by rural water) to achieve more uniform grazing distribution, pasture by pasture and on an annual basis, rather than site-specific analysis of existing water developments and correlated vegetation conditions. We remain concerned that similar and additional proposals for pipeline water development will follow Stony Butte and others across national forests and grasslands in South Dakota, resulting in uniform forage utilization patterns and reduced grassland biological and structural diversity within pastures. Implementation, timing, and intensity of cattle grazing and prescribed fire where non-native vegetation has invaded, are recognized in science as two dominate management tools on native prairies. However, in the future if additional livestock water facilities are again proposed, we request that Fort Pierre National Grassland include increasing the number of rest-rotation grazing systems as part of the preferred alternatives and proposed actions for all new water development proposals. In this manner, there is an opportunity to increase grassland diversity and heterogeneity between pastures while offsetting the loss of grassland diversity within individual pastures. We believe this approach could have been part of this proposed water expansion in order to remain compliant with the key grassland guidance and direction in the LRMP and Peterson (1998).

We continue to support ongoing vegetation monitoring to determine if these additional water sources in Stony Butte are instrumental in capturing and retaining more native vegetation diversity and structure through livestock grazing. As we stated in our earlier comments, we propose that Fort Pierre National Grassland has the management authority, flexibility, and supporting infrastructure to focus short duration, high intensity, and properly-timed grazing on exotic plant communities in most pastures. We support the full implementation of the LRMP and the direction and guidance it provides for a reasonable balance of uses, values, and priorities for these public grasslands

Sincerely,



Mark Norton

Public Lands Committee Chairman