



THE WILDLIFE SOCIETY
South Dakota Chapter
 1112 Westwood Drive
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November 14, 2016

Darrin Jons
 Ft. Pierre Ranger District
 1020 North Deadwood Street
 Fort Pierre, SD 57532
djons@fs.fed.us

Dennie Mann
 Chairman SDTWS Public Lands Committee
 4012 Oiler Lane
 Rapid City, SD 57701
downtoearth15@rap.midco.net

E-Mail Subject Line: Stony Butte Project Area
 Re: Scoping Notice, Deadline November 14

Dear Mr. Jons,

The South Dakota Chapter of The Wildlife Society (SDTWS) submits 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. To avoid duplication, we request that our assessment comments be used as the basis for our NEPA responses.

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/>

As stated in our assessment comments, the richness and ecological services of intact grassland ecosystems, such as FPNG, are more important as native grasslands are being converted for other land uses. We strongly support FPNG proposal to increase the dominance and diversity of native vegetation, while reducing the extent and expansion of invasive non-native grasses and weeds. We concur that this is a significant issue and are very aware of the challenges involved with invading undesirable vegetation. While non-native grasses originally were used to hold soil in place after unsuccessful homesteading, a monoculture of these grasses contributes to a loss of diverse native vegetation and concomitant native habitat fragmentation. The primary vegetation management tools available to FPNG in this scoping proposal include livestock grazing, prescribed fire, haying, and mowing. Trials with native forb plantings are encouraged but at this time, will not significantly alter vegetation composition across vast acreages.

It appears this project is not a livestock allotment revision. Therefore, no significant changes will be made to existing livestock grazing systems and FPNG will continue to graze livestock with the directives provided in its Land and Resource Management Plan (Plan). To achieve the structure and seral stage shortfalls identified in the scoping notice, FPNG will need to list specific goals and

methods to track progress for these shortfalls. This is especially important since USFS grazing permits are generally for 10-year terms and this project may not see full implementation or success for 20 years (Scoping Notice page 5).

The purpose and need statements in the scoping notice identify deficiencies in current vegetation management, as related to meeting the FPNG Plan direction and guidance for vegetation composition, structure and other resources. Recommendations are made to increase the net number of tanks, taps and pipelines on FPNG, rather than relying on private wells for FPNG pipelines. The Plan's direction and guidance includes a no net gain in livestock water developments, yet the Stony Butte proposed action includes several water developments. The obvious reason behind the LRMP direction and guidance is to reduce management practices that produce uniform composition and grassland structure and to encourage management that enhances rangeland heterogeneity.

Therefore, NEPA analysis should address how the proposed actions for the new water developments are justified given the Plan's no net gain. The analysis should also address how each new water development will alter vegetation composition and structure within the zone of the water development's zone of influence. Also, how will added water move vegetation and wildlife responses towards desired condition objectives listed in the LRMP? More specifically, the analysis should display how each new water development will reduce or eliminate the deficiency in current management for meeting low and high vegetation structure objectives within and between pastures in the grazing allotment where each new development is proposed.

We also request that NEPA evaluations provide a comparison of the new proposed water densities in the project area, include other water developments across FPNG since 2001, and compare today's density (including the proposed project) with the density that existed when the FPNG Plan revised in 2001. This would be considered either connected actions or cumulative effects analysis with a continued increase in water developments across FPNG.

We propose that NEPA analysis identify all factors that are preventing FPNG from having sufficient management flexibility for making needed adjustments in current grazing management under the existing FPNG range allotment management plan. Our hope would be that this type of analysis could help identify a broader range of alternative actions to help counteract expansion of invasive plant communities.

Concerning Figure 3 and development of new roads and parking area: SDTWS supports the construction of new roads to fishing areas and the parking lot. Wet areas should be avoided and when not possible, seasonal access or gravel will allow for less soil disturbance, keep vehicles in the roadway and avoid driving in the grasslands for access.

Concerning Figure 4 and proposed actions for changes to infrastructure: we cannot find where the fence will be removed. What is the purpose of removing the fence and how will vegetation changes be monitored by creation of a larger pasture?

The South Dakota Chapter of The Wildlife Society appreciates the opportunity to provide commentary and suggestions to this NEPA scoping effort. Please continue to send correspondence to our Chapter on this important proposed project.

Sincerely,



Dennie Mann
Public Land Chairman
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