



THE WILDLIFE SOCIETY

South Dakota Chapter
2012 E Broadway Ave.
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February 5, 2018

Darrin Jons
Ft. Pierre Ranger District
1020 North Deadwood Street
Fort Pierre, SD 57532
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Mark Norton
Chairman SDTWS Public Lands Committee
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E-Mail Subject Line: Stony Butte Project Draft Decision Notice and FONSI
Re: Comments Requested to be Included In The Stony Butte Project
Administrative File

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 demonstrated a sincere interest in this project and we have provided comments throughout the NEPA process. We incorporate by reference our previous comments because our opinions on the major key issues of vegetation structure, diversity, and availability for wildlife habitat have not changed.

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/>. The Wildlife Society parent organization has position statements which are "broad and topical statements on a wildlife issue that defines the issue, contains factual background data, describes the most probable biological, social, and economics results of alternative actions, and may also contain a recommended course(s) of action." Today we incorporate by reference, the recently revised position statement on livestock grazing on rangelands in the western United States at: http://wildlife.org/wp-content/uploads/2017/11/112117_PS_LivestockGrazingonRangelands.pdf. (TWS 2017).

SDTWS is not submitting formal objections on the Stony Butte draft decision notice and FONSI. However, we do want to submit the following information for Ranger Dan Svingen and your consideration. Therefore, we also request that our letter be included in the project's administrative record file. Most of the information herein relates to Fort Pierre National

Grassland's responses to public comments in Appendix A of the draft decision notice (December 2017).

First, we want to commend you and the Fort Pierre staff for the expressed commitment to the grassland diversity (vegetation composition and structure) direction in the Land and Resource Management Plan (LRMP). This commitment is clearly articulated in several of your responses in Appendix A. You also indicated on page 38 (Appendix A) that you are specifically managing for the opposite of uniform grazing, a concern which we have expressed through the need for heterogeneity on public grasslands. We hope that the additional water sources will be actively used and managed to enhance rangeland heterogeneity (within and between pastures) and to suppress exotic cool-season grasses. We also hope that you will closely monitor vegetation composition and structure changes in and around these new water developments to assess short-term and long-term effectiveness of the new water sources, in combination with the other proposed management activities. Monitoring should consist of local and peer reviewed science, be quantitative and repeatable (TWS 2017). Several of these monitoring references are within our previous comments.

On page 46 (Appendix A), you and the Fort Pierre staff also concurred with the value of diverse vegetative structure, including high and dense cover, distributed across the National Grassland. You also stated that additional water sources will be used to strategically locate rest treatments. As we have stated in our earlier comments, we too are also aware of the undesirable effects of long-term rest on expansion of exotic cool-season plant communities in mixed grass prairie. It is our understanding that the location of rest units was to be shifted and moved across the Fort Pierre National Grassland over time (Peterson 1998 as cited in our previous comments). Hopefully, these new water developments will help facilitate more 1 to 2 year rest units and less long-term rest units.

Our last comment relates to monitoring prairie grouse (sharp-tailed grouse and prairie chicken) populations in the project area. On page 32 (Appendix A), you indicated that Fort Pierre staff monitored prairie grouse display grounds across the project area in 1997, 1999 and 2014. Given that the Fort Pierre staff has already been monitoring display grounds in the project area, we request that you reconsider and continue periodic monitoring over the implementation period of this project to help evaluate the effectiveness and impacts of the combined vegetation management activities. We ask why quit monitoring now? Rather we request ongoing monitoring, given that this information would certainly provide an important information feedback loop to support adaptive management. Adaptive management is only as strong as the monitoring which is fed back into that process.

Again, thank you for this opportunity to review and provide input on your proposed project. SDTWS certainly recognizes the significant social, economic, ecological, recreational and environmental services provided by the National Grasslands in South Dakota, including the Fort Pierre National Grassland. Given the expanding loss and degradation of native grasslands and rangelands across the Great Plains, the importance of managing these public grasslands as working lands for the *greater* public good will only continue to increase. The direction and guidance in the current Land and Resource Management Plan (LRMP) is responsive to these changing conditions and needs.

Our membership has skills which could assist the Fort Pierre staff in implementation of the LRMP provisions for wildlife habitat and grassland communities. SDTWS looks forward to working with the Fort Pierre National Grassland and all Forest Service Units within South Dakota in the implementation of LRMP's and other project-level planning.

Sincerely,

Mark Norton
Public Lands Committee Chairman

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