



THE WILDLIFE SOCIETY South Dakota Chapter

February 28, 2020

Bureau of Land Management, Attn: Seth Flanigan
3948 S Development Avenue
Boise, ID 83705

Subject: Notice of Intent to Prepare an EIS to update 43 CFR part 4100 Grazing Administration.

Dear Mr. Flanigan:

The South Dakota Chapter of The Wildlife Society (SDTWS) has identified three relevant and substantive issues with the Bureau of Land Management (BLM) proposal to revise its livestock grazing regulations (January 21, 2020, Federal Register, Notice of Intent or NOI). SDTWS appreciates the opportunity to comment on this important matter. We request that our letter be included in the administrative record and that we receive future correspondence, information, and additional scoping opportunities.

The Wildlife Society (TWS) 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/>. Specific to this matter, as professional wildlife conservationists and scientists we have a keen interest in the management and conservation of wildlife and wildlife habitat on the 274,000 acres of public land administered by BLM within 13 South Dakota (SD) counties.

SDTWS recommends that the following issues be identified and considered as separate and distinct relevant issues in the Environmental Impact Statement (EIS):

ISSUE #1 – Use of Science-Based Management to Restore Rangeland Health and Enhance Wildlife Habitat Will Decrease and Emphasis on Livestock Production Will Increase

It's clear in the NOI that the purpose of the revised grazing regulations is to further streamline grazing permit administration. It's also clear that this will be largely accomplished through expanded use of categorical exclusions, redefining terms, and reducing the engagement of the interested public so as not to "unduly" burden administrative processes. We are concerned and contend that this will diminish the voices of wildlife conservation organizations and others advocating for more balanced land stewardship and science-based resource management within SD and elsewhere. The following Government Accounting Office (GAO) investigation found that BLM land use decisions frequently gave deference to competing commercial uses over wildlife conservation considerations:

GAO/RCED-91-64, March 1991, PUBLIC LAND MANAGEMENT – Attention to Wildlife Limited.

Although this GAO report is dated, it's clearly evident that based on the proposal outlined in the NOI, these earlier findings and concerns remain relevant today, further validating our concern.

ISSUE #2 – Reduced Opportunity for the Interested Public to Participate

BLM revised its resource management planning regulations in 2017. These revisions provided for expanded public involvement, engagement and facilitated the opportunity for the interested public to engage earlier in the resource management planning process. However, the current BLM proposal reduces public engagement opportunities at the local project level. SDTWS contends that this current proposal is inconsistent with the intent of the 2017 revised planning regulations and will reduce the opportunity for wildlife conservation organizations and others to engage and participate in management of the public rangelands in SD and elsewhere. This proposal also reduces government transparency and will make it difficult for the interested public to assess BLM's accountability in implementing the programmatic direction in the SD Resource Management Plan (RMP) during allotment management planning and renewal of grazing permits and leases.

ISSUE #3 - Effective and Timely Implementation of 2015 Sage-Grouse Amendment

The Greater Sage-Grouse (*Centrocercus urophasianus*) (or referred to as sage-grouse) is listed as a Species of Greatest Conservation Need (South Dakota Game, Fish and Parks 2014a). In the State's All Bird Conservation Plan (Baker 2005), the bird is listed as a Level 1 priority species, which is the highest conservation priority based on declining populations across its range. Both priority (core areas) and general habitats occur on and adjacent to BLM lands in South Dakota's sagebrush steppe plant community. Lastly, SD is a member of the Sage-Grouse Initiative (<https://sagegrouseinitiative.com/>) through the Western Association of Fish and Wildlife Agencies. The sage-grouse is a sage obligate species and cannot exist as healthy and sustainable populations outside the sagebrush steppe. Other sage obligates in South Dakota on BLM lands include sage thrasher, Brewer's sparrow, sage vole, sagebrush lizard. While not a sage obligate, pronghorn use sagebrush steppe within their effective habitat. Clearly, SDTWS has a vested interest in the welfare of sagebrush steppe community and the species which inhabit it.

Therefore, SDTWS requests that the EIS provide background information on the progress made to date in implementing the vegetation and habitat management direction in the 2015 sage-grouse amendment to the SD Resource Management Plan. We contend that this type of information is needed for each of the 15 BLM sage-grouse amendments to provide a basis for the interested public to fully and accurately assess the potential impacts of the revised grazing regulations on sage-grouse and the sagebrush ecosystem. We also recommend that the EIS disclose how and to what extent changes in the grazing regulations under each alternative would affect BLM's ability to implement the vegetation and habitat management provisions in the sage-grouse amendment and other agency directives for intact and fragmented sagebrush steppe habitats. Effective and timely implementation of the conservation measures in the 2015 amendment is especially critical given the added risk of West Nile virus on low-elevation greater sage-grouse populations like those occurring in northwestern SD (Kaczor 2008, K.C. Jensen as cited in flake et al. 2010). Due to West Nile and other factors, the sage-grouse hunting season has been closed since 2013 in SD with only one year open in 2016 and an extremely limited harvest allowance in only two counties. Hunting seasons were closed because the annual population status was below objective (South Dakota Department of Game, Fish and Parks 2014b).

ISSUE #4 – Effective Implementation of the SD Resource Management Plan

SDTWS requests that the EIS disclose the impacts of these regulatory changes on the ability of BLM to effectively implement the vegetation, wildlife habitat, and livestock grazing management provisions in the SD RMP during allotment management planning and renewal of grazing permits and leases. We request that the EIS address how changes will impact the ecological services

that these public lands provide. More specifically, we recommend that the impacts be described in terms of the extent and manner in which the regulatory changes will affect plan implementation and the ability of BLM to effectively coordinate and use livestock grazing management as a tool to meet rangeland health, wildlife habitat and other resource objectives and standards.

We submit our concerns and issues with this proposal in a spirit of collaboration. We contend that many people share a common vision of productive rangeland and wildlife habitat supporting diverse plant and animal communities and outdoor recreation opportunities. Whether camping, hiking, hunting or fishing, the contribution these land uses make to the quality of life and economic diversity of small rural communities is priceless. Many of our members live and work in these communities and will attest to the value to them and their families of healthy and well-managed public lands. BLM is mandated to an extremely important role of balanced and sustainable land stewardship, and we support the BLM in that endeavor and acknowledge the complexity in striking that balance.

Sincerely,

Greg Schenbeck, CWB®
Public Lands Committee
P.O. Box 347
Chadron, NE 69337

Cc: SD TWS Public Lands Committee and Executive Board
Keith Norris, TWS

Literature Cited

Bakker, K. K. 2005. South Dakota All Bird Conservation Plan. SD Department of Game, Fish, and Parks, Pierre, South Dakota. Wildlife Division Report 2005-09.

Flake, L.D., J.W. Connelly, T.R. Kirschenmann, and A.J. Lindbloom. 2010. Grouse of Plains and Mountains – The South Dakota Story. South Dakota Department of Game, Fish and Parks, Pierre.

Kaczor, N.W. 2008. Nesting and brook-rearing success and resource selection of greater sage-grouse in northwestern, South Dakota. M.S. Thesis. South Dakota State University, Brookings.

<https://openprairie.sdstate.edu/etd/492/>

South Dakota Department of Game, Fish and Parks, Division of Wildlife. 2014a. South Dakota Wildlife Action Plan. South Dakota Department of Game, Fish and Parks, Pierre. <https://gfp.sd.gov/wildlife-action-plan/>

South Dakota Department of Game, Fish and Parks, Division of Wildlife. 2014b. Sage-grouse management plan for South Dakota 2014-2018. Wildlife Division Report Number 2014-02. South Dakota Department of Game, Fish and Parks, Pierre.

<https://gfp.sd.gov/UserDocs/nav/SageGrouseManagementPlan.pdf>