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Subject: 215 - ARO Letter - Revisions of Corson County AMP DN - Dakota Prairie Grasslands - Appeal #06-01-00-0059 - Grand River Cooperative Grazing Association

To: Appeal Deciding Officer

This is my recommendation on disposition of the appeal filed by Eric H. Bogue, on behalf of the Grand River Cooperative Grazing Association, protesting the Decision Notice (DN) for revisions to the Allotment Management Plan for Corson County on the Dakota Prairie Grasslands.

The District Ranger selected Alternative B and Alternative 2, authorizing the following activities in the Corson County project area (DN, pp. 2 to 4; EA, pp. 11 to 18):

- Livestock grazing would continue in all grazing allotments. Current practices would continue in nine of the 14 allotments affected. Minor changes in grazing rotation or pasture fencing would occur in four allotments. Livestock grazing in the south pasture of the Dieterle Allotment would be reduced by 5 days (i.e. livestock would only be permitted to graze 45 days, rather than the current 50 days). This reduction would only affect this one pasture of this one allotment.
- New range infrastructure would be built to facilitate livestock management.
- Prescribed mowing and burning (1,480 acres) would occur.
- Native tree regeneration would be encouraged; undesired, non-native trees (particularly Russian olives) would be removed.
- Crested wheatgrass (410 acres) and cattle trails (25 acres) would be rehabilitated.
- Unwanted encroachment of prairie dog colonies to adjacent land ownerships would be controlled (48 acres).
- The prairie dog colony previously eliminated via unauthorized poisoning in the Buer Allotment would be reestablished.

My review was conducted pursuant to, and in accordance with, 36 CFR 215.19 to ensure the analysis and decision is in compliance with applicable laws, regulations, policy, and orders. The appeal record, including the appellant's objections and recommended changes, has been thoroughly reviewed. Although I may not have listed each specific issue, I have considered all the issues raised in the appeal and believe they are adequately addressed below.

ISSUE REVIEW

Issues 1 and 3 identified in the transmittal letter were resolved pursuant to two meetings between appellants and Acting District Ranger Sheila McNee on August 24 and 29, 2006. Please see attached letter documenting the resolution of these two points.



Issue 2. Prairie Dogs

Contention 1. The District Ranger failed to adequately balance the proper role of grazing on the affected pastures in favor of management supporting the expansion of prairie dogs with the Corson County Allotment.

Contention 2. The District Ranger failed to place the proper priority on annual monitoring (instead of a “1 year in 3” plan) of existing prairie dog colonies for population levels, soil erosion, and a greater focus on control mechanism to prohibit the encroachment of prairie dogs onto private property (this last issue is required under the provision of the South Dakota Prairie Dog Management Plan).

Response: The contentions claimed above are general and do not refer to any specific law, regulation, or policy guiding agency decisions. It appears that the appellant’s contentions are based on the portion of the decision to actively manage for viable populations of prairie dogs in allotments to meet the goals of the Land and Resource Management Plan (LRMP) for the Dakota Prairie Grassland (DPG) for prairie dogs.

The decision is directly responsive to the purpose and need of the project to be consistent with the recently revised (2002) LRMP for the DPG. The programmatic guidance in the LRMP for the DPG instructs the DPG to assess all prairie dog colonies on a landscape scale, manage prairie dogs to reduce the incidence of prairie dog colony spread onto neighboring lands, and establish two or more prairie dog complexes within the next 10 to 15 years.

To achieve these LRMP objectives, the decision incorporates recommendations from the South Dakota Black-Tailed Prairie Dog Conservation Assessment and Strategy as well as the Black-Tailed Prairie Dog Conservation Assessment and Strategy for the Grand River Ranger District (EA, p. 23). These assessments provide an in-depth analysis of the prairie dog management context and scientific recommendations for meeting the goals of the LRMP. Specifically, the Black-Tailed Prairie Dog Conservation Assessment and Strategy for the Grand River Ranger District identifies the colony that was illegally poisoned on the Buer Allotment for retention and expansion. The decision for the EA allows for reestablishment and expansion of this colony.

The DPG LRMP establishes a minimum population objective for prairie dogs, consistent with the managing for species viability. The LRMP addresses the issue of monitoring frequency for black-tailed prairie dogs directly (LRMP 4-7 and 4-8). The decision to monitor black-tailed prairie dog habitat capability, habitat suitability, and population trends was made in the Record of Decision for the DPG LRMP in 2002, although the decision for the EA includes direction to monitor black-tailed prairie dogs on a 1- in 3-year time interval, which is a more frequent monitoring interval than the LRMP recommendations.

Two separate specialist surveys were conducted during the analysis process for the EA in Response to Comments that black-tailed prairie dogs were a source of sedimentation in waterways bisecting and/or bordering allotments. These surveys and subsequent reports indicate negligible effects of prairie dog colonies on increased sedimentation in waterways (Project File, Docs. I-1 and I-2). As such, appellant’s claim that annual monitoring is necessary to determine

whether black-tailed prairie dogs are in fact having detrimental effects on water quality in allotments is not supported by the analysis in the EA. However, the monitoring of prairie dogs on a 1- in 3-year time interval will also consider the question of whether colonies contribute sediment to waterways in allotments, which was not identified in the DPG LRMP as a monitoring measure. This decision seems to be a measure to validate the specialist report findings that sediment in waterways is not attributable to prairie dogs. As such, the decision satisfies and goes beyond what is necessary based on the analysis in the EIS for the DPG LRMP.

Additionally, the adequacy of control mechanisms for limiting the spread of black-tailed prairie dogs onto neighboring lands has been addressed throughout the analysis in the EA (EA, pp. 13, 14, 15, and 17). The DPG LRMP also directs the DPG to limit the spread of prairie dogs onto neighboring lands. This decision provides for mechanisms to limit spread onto neighboring lands, while also maintaining the species viability on DPG lands.

According to the analysis in the EA and DN, the selection of Alternative B for livestock grazing (with minor modifications) and Alternative 2 for prairie dog management (with minor modifications) properly balances the role of grazing with other objectives. As discussed in the EA (p. 19), very minor modifications to existing grazing opportunities would occur under the selected alternative, while working to meet the objectives for prairie dog viability in the DPG LRMP.

I find that the District Ranger adequately considered your issues related to prairie dogs.

RECOMMENDATION

I have reviewed the record for each of the contentions addressed above and have found that the analysis and decision adequately address the issues raised by the appellant. I recommend the District Ranger's decision be affirmed and the appellant's requested relief be denied.

/s/ Paul Bradford
PAUL BRADFORD
Appeal Reviewing Officer