



THE WILDLIFE SOCIETY

South Dakota Chapter

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Buffalo Gap National Grasslands
Wall Ranger District
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Subject Line: Cheyenne River Area Range Allotment Plan

The South Dakota Chapter of The Wildlife Society (SDTWS) submits comments concerning livestock grazing on 6 grazing allotments on the Cheyenne River area of the Buffalo Gap National Grasslands. Our organization has an interest in this project and we appreciate the opportunity to comment. 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/>

In the Review of your proposed actions:

1. Combining Indian Creek and Big Corral allotments: This could improve rest rotation and allow managed grazing with movement to the other pasture when monitoring and evaluation of the pasture dictates movement of livestock.
2. Fence along the Cheyenne River: Good management practice but difficult to achieve during high-water years and flooding. Keeping bison and cattle from repetitive movements to riparian areas will require monitoring and maintenance of fence to limit impacts to the riparian community. Other metrics in addition to percent utilization should be itemized in the monitoring table. Utilization of >40% in riparian areas will not allow adequate riparian vegetation growth to stabilize river banks and improve wildlife habitat
3. Dam repair, well placement, pumps and tanks: Water placements are critical and will improve grazing management. Placement away from the riparian areas will

limit use on those corridors and allow for better grazing utilization on the upland areas.

4. **Herding:** This is an excellent direction to limit overuse but requires increased monitoring and knowledge to improve grassland health and its reproductive potential throughout the grazing season.
5. **Prescribed Fire Utilization:** Fire is an appropriate management tool in prairie ecosystems and when utilized can increase native grass and forb production. Planning is critical to achieve desired goals and a one year rest after the burn from grazing (except where cool season non-natives need to be suppressed) will limit negative impacts and improve grassland health and vigor.
6. **Salt and Minerals:** This is a way to reduce impacts along sensitive areas and can be utilized in similar ways such as water locations to distribute grazing pressure. Salt and minerals must be kept far from wet meadows, saturated soils and riparian areas.
7. **Adaptive Management Grazing:** Priority should be given to monitoring to ensure adaptive management grazing is effective at meeting range condition goals.
8. **Allotment Management and condition:** We appreciated the enclosed maps but noticed that key monitoring areas were not highlighted. What is the desired condition for each allotment?
9. **Drought.** We are extremely supportive of a RMP which includes drought management. Timing and grazing pressure are crucial outside of drought, but even more important during and following drought. We encourage that the attached drought article by Reece et al. remain in the EA and be incorporated into individual operating plans

With the evaluation of the proposed alternatives the South Dakota Chapter of The Wildlife Society is supporting Alternative 3 (Adaptive Management). Adaptive management has the options to address various issues as listed in our above comments. Alternative 3 will be successful only with proper and intense monitoring of the allotments to achieve desired ecological conditions for riparian areas (with incorporation of additional triggers and backing off from >60% use), vegetative structure, and native species composition. The South Dakota Chapter of The Wildlife Society appreciates the opportunity to provide comments. Please continue to send correspondence to our Chapter.

Sincerely,

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