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NORTH DAKOTA GRAZING ENVIRONMENTAL IMPACT STATEMENT

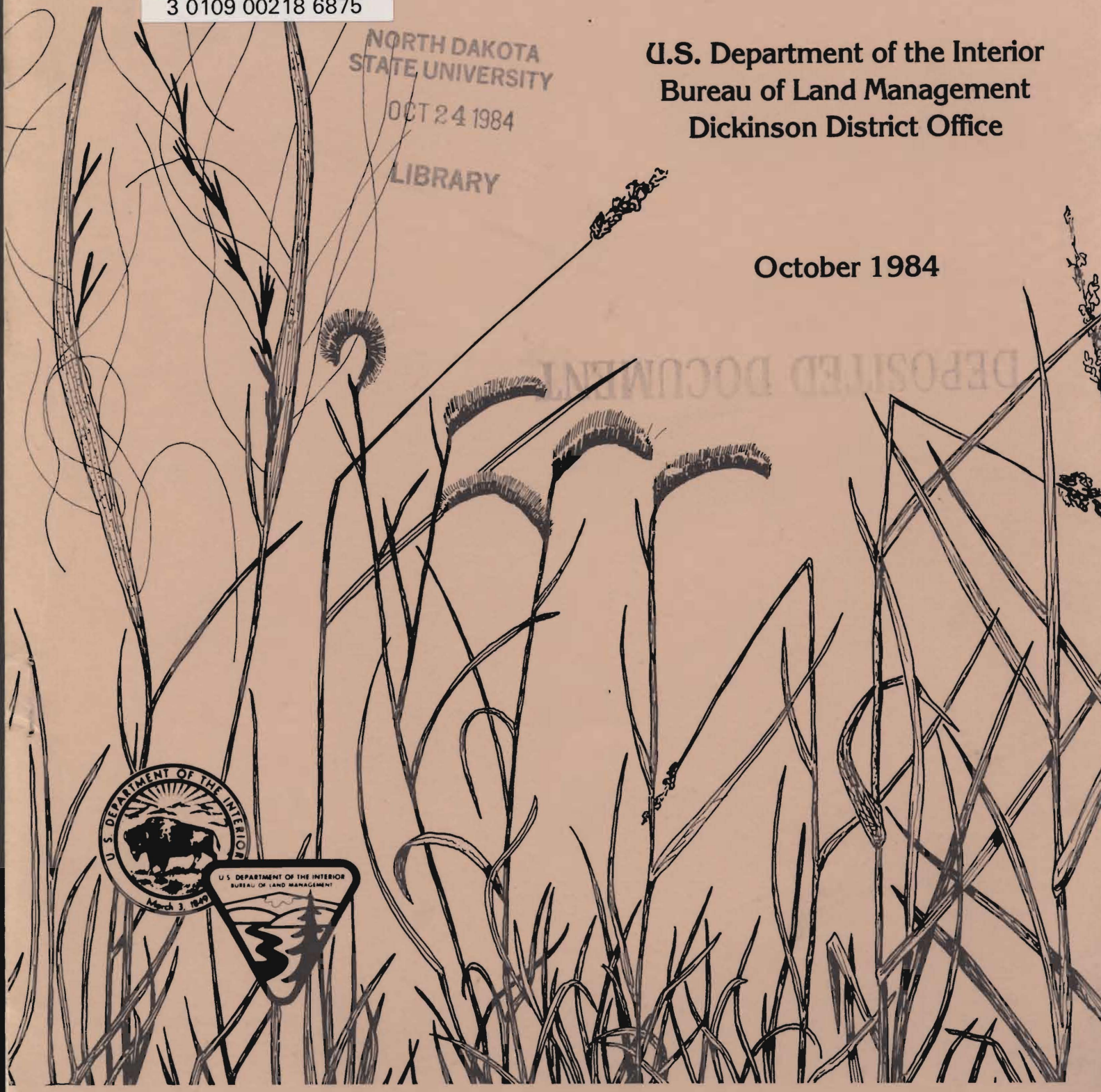
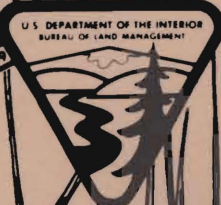


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Dickinson District Office

October 1984

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BLM-MT-ES-84-023-4322

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FINAL

NORTH DAKOTA GRAZING
ENVIRONMENTAL IMPACT STATEMENT

For The

DICKINSON DISTRICT, NORTH DAKOTA

Prepared By

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

October 1984

NORTH DAKOTA GRAZING ENVIRONMENTAL IMPACT STATEMENT

() Draft

(X) Final

Lead Agency

U.S. Department of the Interior, Bureau of Land Management

Types of Action

1. Administrative (X)

Legislative ()

2. Abstract

This statement assesses the environmental consequences of four alternative courses of action for future grazing management on approximately 68,000 surface acres of public land administered by the Bureau of Land Management (BLM) in North Dakota. The four alternatives range from elimination of livestock grazing on all grazing allotments to increased management levels that strike a balance between livestock use and enhanced environmental protection.

3. The four alternatives and their analyses were presented for public review in the Draft Environmental Impact Statement (EIS) issued in February 1984. This document is hereby incorporated into this Final EIS.

4. For further information regarding this statement or proposed alternative action contact:

Raymond C. Altop
Project Manager, North Dakota Grazing EIS Project
Bureau of Land Management
Dickinson District Office
204 Sims Street
P.O. Box 1229
Dickinson, ND 58602
(701) 225-9148



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

Dickinson District Office
P.O. Box 1229
Dickinson, ND 58602

Dear Reader:

The North Dakota Grazing Environmental Impact Statement Draft (DEIS) was made available to the public on February 10, 1984, and public review and comment were requested. Comments received did not warrant substantial changes in the data, analysis, or narrative in the DEIS. Responses to the comments are presented here in the form of factual corrections and explanations of data collection analysis methods. The entire contents of the DEIS have not been reprinted.

Twelve comment letters were received by the Dickinson District Office. (Responses to specific comments are included within this document.) The major concern expressed by the commenters was the apparent lack of detailed inventory data. This was especially a concern of the wildlife interests responding to our request for comments.

The DEIS utilized data collected through BLM inventories, historical grazing records, contracted inventories, and biological determinations by natural resource professionals. The entire data base used in the environmental analysis of grazing on BLM-administered public lands in North Dakota was not reprinted in the DEIS due to the prohibitive costs of publishing as well as the inappropriateness of presenting this detail to the general audience of the DEIS. The data presented in the DEIS represent only a summary of the more extensive and detailed data used during the analysis. The complete data base used in preparing the DEIS is available for review in the Dickinson District Office.

All vegetation production and livestock utilization data presented in the DEIS were utilized for identification of resource conflicts, development of alternatives, and analysis of alternatives. While these data are fully adequate for purposes of planning and analysis, they must be supported by the results of proposed monitoring studies before forage use authorizations can be adjusted.

The North Dakota Grazing Final Environmental Impact Statement (FEIS) completes the environmental analysis of the overall grazing program on BLM-managed lands in North Dakota. Further environmental analysis will be completed for specific range development projects following activity planning. Within five months of issuance of this FEIS the Dickinson District Office will prepare, and issue for public review, a Range Land Program Summary (RPS). The RPS will document the final range program decisions for grazing on BLM-administered lands in North Dakota. The final range program decisions will involve the selection of an alternative or portions of alternatives analyzed in the DEIS.


Edwin Zaidlicz
Montana State Director

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ANNALS
OF THE
ROYAL SOCIETY OF LONDON
AND
THE
MAGAZINE OF NATURE

SUMMARY

This Final Environmental Impact Statement (EIS) hereby incorporates the Draft EIS which discusses four alternative courses of action for grazing management on approximately 68,000 acres of land administered by the Bureau of Land Management (BLM) in 31 counties in North Dakota. These four alternatives are based on resource inventories, issues raised by the public and procedural requirements. The alternatives are analyzed with emphasis on the significant issues and impacts.

Proposals in Alternative A and C would reduce the amount of range in fair ecological range condition. Alternative B would keep the situation as it is, and Alternative D would eliminate grazing.

Initial livestock animal unit months (AUMs) would remain the same in Alternatives A and B, decrease by 20% in Alternative C and decrease to zero in Alternative D. In the long term (15 years after implementation), Alternative D would result in no livestock AUMs; Alternative B would not change livestock AUMs and Alternatives A and C would increase the livestock AUMs above the short term projections. The preferred alternative would increase livestock forage by 15% over the existing AUMs because of implementation of mechanical and grazing treatments, the development of range facilities and leasing previously unleased lands.

Both the public and BLM are concerned with maintaining adequate wildlife habitat while maintaining a balance between livestock and wildlife use.

Protecting soil by reducing erosion is another major concern of both the public and BLM resource specialists. Increasing vegetation cover through mechanical or grazing treatments would improve the capacity of the soil to absorb the water necessary for vegetation production. Increased absorption of moisture into the soil reduces runoff, erosion and maintains soil productivity. High levels of vegetation production would increase the amount of forage for both livestock and wildlife use.

A summary of the environmental consequences for each of the four alternatives follows.

ALTERNATIVE A: RANGELAND IMPROVEMENT

As the preferred alternative, this proposes revision while continuing operation of the three existing AMPs on 20,403 acres of public lands administered by BLM, continued permitted grazing on 94 allotments encompassing 53,420 acres, leasing 3,000 additional acres suitable for grazing, and leaving 11,580 acres unleased for grazing.

Watershed conditions would improve in the long term, with a reduction of sediment and water yields by approximately 10% and 5%, respectively.

Ecological range condition would be maintained or improved to good to excellent condition on most lands. Total vegetation production would increase approximately 6½% in the long term.

Total increase in net annual income to all affected ranch operations would be \$5,400 in the long term. The long term increase in livestock sales would be \$11,000

Wildlife habitat would improve with special consideration given to protect crucial wildlife habitat and wintering areas.

Improved watershed and ecological range conditions would reduce the natural destruction of some cultural resource sites by erosion. Long term loss of scientific data could occur if sites were destroyed by ground disturbances resulting from implementation of range projects and land treatments. However, most range improvements would be located to avoid cultural sites.

Implementation cost of this alternative would be \$160,000.

ALTERNATIVE B: NO ACTION — CONTINUE PRESENT

This alternative would freeze the current range program as it is today. Livestock stocking rates would remain the same, regardless of range condition or trend. AMPs in effect would continue but no new range improvements would be developed. Maintenance of current improvements would be allowed. In the short term, the general range condition and trend would continue. In the long term, they would remain static or decline due to lack of adequate monitoring and supervision and spread of noxious weeds.

Watershed conditions would deteriorate in the long term. In the short term, there would be little discernable change.

Wildlife habitats would continue as they are currently trending. Without the capabilities to manage livestock use, livestock concentrations would cause local deterioration of habitats. No additional residual cover would be available for upland game, waterfowl and other species.

There would be no implementation cost for this alternative as maintenance would be the responsibility of the operator.

ALTERNATIVE C: REDUCED LIVESTOCK USE

This alternative proposes continuing the three existing AMPs, continue permitted grazing on 94 allotments

and leasing 3,000 unleased acres for grazing. Target AUM figures would be 20% of the total vegetation to livestock and 80% to wildlife and nonconsumptive uses.

Watershed condition would improve in the long term with a reduction in sediment and water yields by approximately 12% and 6% respectively.

Range conditions would be maintained or improved to good or excellent condition on most lands. Vegetation conditions would improve in riparian areas, around reservoirs and on erosion-susceptible areas. Livestock AUMs would be reduced by 1,951 AUMs in the short term due to vegetation use target levels being reduced from 25% to 20% of the total production. In the long term, there would be a 15% increase in AUMs to a livestock beyond the short term projections.

Wildlife habitat would improve for big game, upland game and waterfowl as would nongame habitat.

Total short-term decreases in net annual income to all affected ranch operations would be \$17,200. Total long term decreases in net annual income to all affected ranch operations would be \$11,250.

Total implementation cost of this alternative would be \$192,000.

ALTERNATIVE D: NO GRAZING

This alternative would eliminate livestock grazing on public land administered by the BLM, affecting 97 allotments. No range improvements would be built or maintained unless the improvements were considered necessary for watershed or wildlife resources.

Watershed improvement would be relatively small. Sediment yields would be reduced about 5% and water yields by an insignificant amount.

Ecological range condition would initially show improvement then stabilize and show some decline due to lack of grazing stimulus necessary for vegetation production.

Wildlife habitat would improve initially, but would trend toward climax or decadent conditions which is less desirable habitat.

The 3 operations with AMP allotments would be severely affected due to the loss of all BLM AUMs. The attitudes of affected ranchers would probably be extremely negative toward BLM and the plan. Total short and long-term decreases in net annual income to all affected ranchers would be \$85,000. The annual loss in livestock sales would be \$165,000 and gross business value would decrease by \$744,900 annually. In the long term, these changes would be insignificant to the regional economy.

Total implementation of this alternative would be \$1,495,000 (the cost to fence off public land with approximately 650 miles of fence).

INTRODUCTION

This North Dakota Grazing Final Environmental Impact Statement (EIS) incorporates by reference the Draft EIS which was published in February 1984, as modified and corrected by Part I of this document. Part II of this final document contains letters of comment received from the public on the Draft EIS and BLMs responses to these comments.

The Draft EIS was filed with the Environmental Protection Agency and released to the public on February 2, 1984. The Federal Register of February 10, 1984, carried a notice of availability and requested public review and comment. Copies of the Draft EIS were sent grazing lessees, organizations, and individuals on the North

Dakota Grazing EIS mailing list. Approximately 300 copies of the documents were distributed. Public reading copies were available at BLM offices in Washington, D.C.; Billings, Montana; Dickinson, North Dakota; and at public libraries throughout the region.

Copies of the Final EIS will be forwarded to the Secretary of the Interior and to the Environmental Protection Agency. Copies will also be mailed to all official review agencies, organizations, industry, individuals on the Grazing EIS mailing list, and public libraries within the region. Copies will also be available upon request at the BLM offices in Billings, MT, and Dickinson, ND.

PART I
MODIFICATIONS AND CORRECTIONS

1. The first column shall be headed "Name of the person" and shall contain the name of the person in full, including the name of the mother and father, and the date of birth.

2. The second column shall be headed "Date of conviction" and shall contain the date of the conviction of the person.

3. The third column shall be headed "Date of release" and shall contain the date of the release of the person.

4. The fourth column shall be headed "Date of re-arrest" and shall contain the date of the re-arrest of the person.

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PART I MODIFICATIONS AND CORRECTIONS

This section of the Final EIS contains all the modifications and corrections to the Draft EIS.

Table of Contents: Chapter 1

Change "Management Guidelines and Resource Condition" to "Management Guidelines and Resource Coordination."

Page 2, Left column, section heading:

Change "Management Guidelines and Resource Condition" to "Management Guidelines and Resource Coordination."

Page 3, Left column, paragraph 3, sentences 2 and 3:

Change these two sentences to read as follows:

"These plans will be designed to address specific management objectives identified through monitoring. They may take the form of allotment management plans (AMPs) where feasible, habitat management plans (HMPs), watershed management plans (WMPs) or cooperative

management agreements with grazing lessees and other agencies such as the Soil Conservation Service or the North Dakota Game and Fish Department."

Page 18, Left column, paragraph 1, sentence 4:

Remove from the text "Another tract is near a rock shelter site."

Page 28, Right column, paragraph 5:

Add to the end of this paragraph "However, if livestock use patterns change significantly in the future, water quality and quantity conditions could be degraded at some locations. This alternative would not permit making adjustments in order to correct this potential problem."

Page 32, Right column, paragraph 2, sentence 2:

Change "Additional wetlands would be maintained" to "Other water sources would be maintained."

Lands Infested with Leafy Spurge

Township	Range	Section	Subdivision	
154N	75W	30	NW $\frac{1}{4}$ SW $\frac{1}{4}$	McHenry County
		24	NE $\frac{1}{4}$ NE $\frac{1}{4}$	
		25	S $\frac{1}{2}$ NE $\frac{1}{4}$	
		26	N $\frac{1}{2}$ SE $\frac{1}{4}$ S $\frac{1}{2}$ NE $\frac{1}{4}$	
155N	76W	10	NE $\frac{1}{4}$ SW $\frac{1}{4}$	
		23	N $\frac{1}{2}$ NW $\frac{1}{4}$	
			SE $\frac{1}{4}$ NW $\frac{1}{4}$	
			NE $\frac{1}{4}$ SW $\frac{1}{4}$	
	77W	7	NW $\frac{1}{4}$ SE $\frac{1}{4}$	
		18	SW $\frac{1}{4}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ NE $\frac{1}{4}$	
156N	77W	10	NW $\frac{1}{4}$ SW $\frac{1}{4}$	
		15	NW $\frac{1}{4}$ NE $\frac{1}{4}$	
		28	NW $\frac{1}{4}$ SE $\frac{1}{4}$	
			N $\frac{1}{2}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$	
157N	75W	15	SW $\frac{1}{4}$ SW $\frac{1}{4}$	
154N	95W	7	SW $\frac{1}{4}$ NW $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$	Williams County
	96W	12	SE $\frac{1}{4}$ NE $\frac{1}{4}$	

Information Source: BLM Isolated Tract Inventory. Exact number of acres infested is unknown. For preliminary planning purposes we are estimating 200 acres of leafy spurge.

MODIFICATION AND CORRECTION
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PART II

PUBLIC COMMENTS AND RESPONSES TO PUBLIC COMMENTS

This section includes public comments received on the North Dakota Draft EIS and the responses to the public comments.

The major comments and questions were bracketed and numbered. The response to each comment has a corresponding number and is opposite the comment. In order to save time and space, where the same comment or question surfaces several times the reader will be referenced back to an earlier responses.

All comments are printed in their entirety.

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REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF EDUCATION
BUREAU OF EDUCATION
DIVISION OFFICE - CAGAYAN DE ORO

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BLM - Dickinson District

APR 17 1984

Reading Central

AREA CODE 701
TELEPHONE 237-9679

North Dakota State University
OF AGRICULTURE AND MECHANICAL ENGINEERING
FARGO, NORTH DAKOTA 58102

DEPARTMENT OF BOTANY/BIOLOGY

April 16, 1984

Mr. Raymond C. Altop, Project Manager
Dickinson District Office
Bureau of Land Management
P.O. Box 1229
Dickinson, ND 58602

Dear Mr. Altop:

Thank you for the opportunity to review the N.D. Grazing Environmental impact statement prepared by your office. I can appreciate the difficulty in carrying out this type of assessment and wish to simply add a few comments for your consideration.

The alternatives you propose all have merit for consideration. However, it is my opinion that the total adoption of any one of them alone would perhaps be an injustice to the rangeland resource in general. One of the major problems in deciding which alternative(s) (or combinations) is most appropriate is the lack of basic inventory information which would indicate present conditions and future trends for optimum livestock and wildlife usage. An on-going inventory and assessment program needs to be considered and implemented. This type of program could be contracted on a long-term basis at a very nominal cost with a university or similar non-profit type of institution. Until a solid, reliable, data base is developed, management schemes are all subject to individual bias, inaccuracies, and guess. The long term effects of this approach are already evident in too large a proportion of federal, state, and private rangelands.

As I understand it, your non-leased acreage is a substantial amount of land for which you presently do not collect fees for a variety of reasons, -- most probably fragmented areas or small parcels with no accessibility. It would seem the only way to effectively lease and collect fees will be to consolidate some of those holdings. This past year I was involved in assessing some of these parcels and there is no doubt but what a number of sales, exchanges or other consolidations need to be made. These isolated parcels are not manageable except as part of a larger system and do not generate a return to the public treasury.

A combination of alternatives A, B and C is needed based entirely on the condition and trend of the existing vegetation and soils. It would be prudent to maintain the present level of management unless it is obvious that an overuse is occurring on specific allotments or areas within a given allotment. The calculation of forage values (livestock products) by the A.U.M. method is appropriate for that portion of the vegetation assigned to grazing but not that which is left as a maintenance factor. That portion does not have an A.U.M. value since it is necessary to leave it to maintain the system.

Best wishes and if I can be of service to you in the future, please let me know.

Sincerely,
Hayold Goetz
Chairman & Professor

HG/bg

1.1) The Bureau of Land Management utilized the best available data in performing the analysis in this DEIS. These data consisted of inventory and survey results gathered by BLM personnel largely during 1979 through 1982, historical BLM range inventory data, data gathered by the North Dakota Game and Fish Department under contract to BLM, published data by Soil Conservation Service, US Fish and Wildlife Service, North Dakota Game and Fish, and others, and personal contacts with other professionals in resource management fields. The results of analysis of this data as well as summaries of data used are presented in the DEIS. The more detailed data on which the summary tables and analyses are based are available for review in the Dickinson District Office files.

More resource information would be desirable in many instances but was not available during the preparation of the EIS. When detailed data were not available, the analysis was completed using the knowledge and professional opinions of various resource specialists both within and outside the BLM.

Monitoring strategies that track ecological range condition, trend and actual use are being developed in an overall District rangeland monitoring plan. This plan will identify specific rangeland monitoring activities for each allotment.

1.2) Land base adjustment is discussed in land use planning documents (MFPs) that have been prepared for much of the District.

1.3) The use of AJM figures for non-utilized vegetation for wildlife cover, watershed maintenance, etc. is for illustrative and comparison purposes only. Essentially, this shows that for every 100 lbs of above-ground annual production, 25 lbs are authorized for livestock consumption. The remaining 75 lbs are for wildlife and watershed maintenance and other nonconsumptive needs. (25 lbs wildlife consumption, 50 lbs rangeland maintenance and watershed protection with assumed proper use).

BLM arrived at stocking rate figures and the subsequent comparative AJM figures using methodology from the National Range Handbook (USDA, SCS 1976), SCS technical guides, BLM Missouri River Basin study data and field studies, including actual use information. BLM stocking rate calculations do take into account proper use factors.



State of North Dakota
DEPARTMENT OF UNIVERSITY & SCHOOL LANDS

Capitol Building
 Bismarck, North Dakota 58505
 701-224-2800

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 Reading _____ Central _____

April 4, 1984

Raymond C. Altop
 Project Manager
 Dickinson District Office
 Bureau of Land Management
 P.O. Box 1229
 Dickinson, ND 58602

RE: Draft North Dakota Grazing
 Environmental Impact Statement

Dear Mr. Altop:

I have reviewed the Draft North Dakota Grazing Environmental Impact Statement and have several comments. This document proposes four alternative grazing management programs but lacks a meaningful analysis of them.

A major shortcoming is the combined analysis of the scattered tracts and those areas with allotment management plans (AMPs). It should be recognized in the planning document that, except for specific high priority cases, grazing has occurred and will continue to occur on many of the scattered tracts of land. Therefore, leasing these tracts for grazing will not result in an 8 percent increase in forage for livestock as asserted under the preferred alternative A since livestock are already using these areas (Appendix G).

The statement that under alternative C "Lands that are presently unleased for livestock use would remain the same with vegetation reserved for wildlife and non-consumptive uses" (page 7) also conflicts with the actual current use of these lands. The management constraints on these scattered tracts are different than on those areas with AMPs and they should be considered separately as done in the recently completed Southwest North Dakota Management Framework Plan.

A second area which is both technically and practically incorrect

2.1) Implementation of Alternative A would not result in a short-term increase in forage. The DEIS indicates that 3000 acres with 750 AUMs available for livestock use (based on SCS technical guide data) would be leased for grazing, increasing the authorized use 8 percent (DEIS, p. 25.) Under Alternative C, lands presently unleased for livestock use would remain unleased and corrective actions to eliminate unauthorized use would be taken.

2.2) We agree small scattered tracts of land pose significant constraints to management. The effects and extent of these constraints are addressed in the various management framework plans prepared in the Dickinson District. The MFPs provide a basis for management alternatives in the EIS.

Raymond C. Altop
continued
page 2

is the categorization of all above ground vegetative production as animal unit months (AUMs). A certain percentage of the vegetative production is required for plant and watershed maintenance and must be allocated for those purposes before consumptive uses can be considered. Vegetative production beyond the ecosystem maintenance requirements can then be allocated for consumption by livestock, wildlife and etc. and can be defined in terms of AUMs. Instead, this document defines all above ground vegetative production in terms of consumptive animal needs (AUMs) and allocates an arbitrary 75% to wildlife and undefined nonconsumptive uses. This usage is contrary to the principals of good range management and ecological theory. It does not recognize the primary importance of maintaining the productive capacity of the ecosystem.

In this brief review of the Draft North Dakota Grazing Environmental Impact Statement, I have outlined only two representative examples of the many shortcomings in the analysis of the four land management proposals. It is my opinion that this document does not adequately define or analyze the alternatives and is therefore unacceptable from a good land management perspective. Although alternative A appears to be the best proposal and conforms to the 1983 Management Framework Plans (BLM), it is not adequately documented.

Thank you for the opportunity to comment on this document.

Sincerely,

Michael D. Brand

Michael D. Brand
Range & Soils Management Specialist

MDB/ch

cc: Gary Helgeson
ND Governor's Office

2.3

2.3) See response 1.3.

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BLM - Dickinson District

1003 W. Nevada
Urbana, IL 61801
April 9, 1984

APR 16 1984

Reading _____ Central _____

Mr. Raymond C. Altop, Project Manager
Dickinson District Office
Bureau of Land Management
P.O. Box 1229
Dickinson, North Dakota . 58602

Dear Mr. Altop,

Thank-you for allowing me the opportunity to read and respond to your North Dakota Grazing Environmental Impact Statement. There were several areas I felt required further clarification as to the impacts they could have on the surrounding environment.

The first is your proposed control of the noxious weed - leafy spurge. Two of the alternatives, A and C, have \$100,000 budgeted for this control action but little mention is made of what consequences could arise from this procedure. A couple methods are proposed - herbicides and biological control. The only mention of consequences for herbicide use is that you would be "using acceptable herbicides that provide acceptable control" (p. 7). What effect would the herbicides have on the aquatic and non-target plants in these areas?

In looking at the possibility of biological control, my first question would be which method would be used? In your glossary you mention three methods: predators, parasites, and disease-producing organisms, each of which bring up questions that must be answered. For example, where do the organisms come from? How target-specific will they be? What are their possible effects on nearby plants and animals? How will their spreading be controlled to the target plants and areas?

In discussing the effects on wildlife habitat of Alternative A it was mentioned that improvement would be seen "providing that adjacent land does not negate management practices on BLM lands" (p. 26). Since the use of these lands is beyond the BLM control, how would the project be affected if these lands were taken out of conformance with the project's desires? For instance, if the adjacent lands were no longer available for wildlife usage, how would this impact the BLM's provision of their land for wildlife?

Alternative B seems to contain a possible contradiction in the watershed and soil sections (p. 28). The watershed portion talks about the project as "causing no discernible change in the water quality or quantity characteristics" and that although no data are

3.1) The consequences of herbicide use for leafy spurge would be addressed in a herbicide use plan that would be prepared before application. The plan would be developed in cooperation with local weed control officials and would include considerations for aquatic and non-target plants as well as other considerations for human welfare and ecosystem components.

3.2) Biological control, although presented as a possibility, is only experimental and largely uncertain at present. The BLM cannot adequately discuss biological control until approved organisms and methods are developed and released for use by the appropriate agencies.

3.3) Although adjacent land use may reduce the capability of BLM lands to support present or increased levels of wildlife, BLM land would remain available to the wildlife species occurring in the area.

3.4) We agree, there does appear to be a contradiction; however, both statements are correct. Indications are that, in general, watershed conditions are improving as stated in the document. Because resource conditions seldom remain static and livestock use patterns change, the potential for site-specific soil conditions to deteriorate would exist unless management adjustments are made. This would also apply to long-term watershed conditions in site-specific cases (see Part I for changes in text).

3.5) Under any management, certain wildlife species will be benefited at another's expense. The objective of Alternative A is to improve rangeland conditions where practical and possible to meet the needs of key wildlife species as well as livestock and watershed. Grazing increases could occur following monitoring and evaluation because of increased vegetation production. Stocking rates would remain at or near the same level of use now authorized. More clarification may be provided under response 9.8.

3.6) Wetlands are being lost at an increasing rate nationwide through drainage, urbanization, pollution, etc. Maintaining existing wetland habitat and creating new wetlands help to offset this loss. All natural wetlands would be maintained in their natural state or enhanced in coordination and cooperation with the U.S. Fish and Wildlife Service and ND Game and Fish Department. All "artificial wetlands" or stockpounds would receive maintenance required to prevent premature aging or failure.

3.7) All areas where ground is to be disturbed by range or other developments are inventoried for prehistoric and historic features. Determination of acceptable limits of impacts to cultural resources is done through evaluation and consultation with the State Historic Preservation Officer and the Advisory Council on Historic Preservation. Where feasible, cultural sites are avoided. (See also letter 10 and Appendix C, DEIS.)

3.4

available "early indications are that it is slowly improving." But in the soils section it is stated "watershed conditions could deteriorate in the long run." I was interested in how both of these could be correct. Presumably, one is correct, and I would like to see further analysis and substantiation of the one that is correct.

Switching to wildlife, in Alternative A, it is mentioned that "overall, wildlife habitats would remain at current or improved conditions" (p. 26). From this I feel that you do not foresee all of the results being positive. Do you feel that there could be localized decreases in the quality of habitat for any species or population in the environment? Earlier in the text you mentioned "grazing does reduce the amount of residual vegetation necessary for optimum waterfowl production" (p. 26). Would this be one area in which a possible decrease would be found since grazing would be increased in the proposed alternative?

3.6

Also in Alternative D part of the discussion is about wetlands (p. 32). From this it is implied through the pushing for maintaining and creating new wetlands, that they are necessary. What is a realistic level of wetland maintenance that could be expected with this alternative?

3.7

The assessment of the impact of Alternative A on the cultural resources states that they "would be within acceptable limits" (p. 27). What is the measure used in making this determination (i.e., number of sites, dollar value) and what is and is not considered acceptable? Also there is mention of creating new wetlands. Are the cultural resources that could be lost due to this just conceded or will there become checking before the wetlands are added? Also is this considered when stating that the impact falls within acceptable limits?

Thank-you for your consideration of these issues. Hopefully your response to the areas I have requested further information on will be helpful to myself and others in better understanding the potential impacts of the grazing alternatives you have suggested.

Sincerely,

William J. Hinsman



NORTH DAKOTA
STATE DEPARTMENT OF HEALTH
State Capitol
Bismarck, North Dakota 58505

M. A. K. Lommen, M.D., R.P.E.
State Health Officer

Environmental Health Section
Missouri Office Building
1200 Missouri Avenue
Bismarck, North Dakota 58501

March 1, 1984

Raymond C. Altop
Project Manager
Dickinson District Office
BLM
P.O. Box 1229
Dickinson, ND 58602

Dear Mr. Altop:

This Department has reviewed the draft environmental impact statement on the management of grazing on public lands administered by the Bureau of Land Management in North Dakota. We have two items of water quality related concerns in this EIS.

The first concern is the obvious soil erosion problems due to the highly erosive type soils in the BLM managed areas. It is realized that there is no easy or cost effective method of reducing soil erosion. However, it should be kept in mind that when applicable, best management practices should be implemented to reduce erosion and subsequent sediment loading to receiving streams.

The second area of concern is the leafy spurge control program. Before application of any herbicides to eradicate leafy spurge, consideration should be given to the proximity to water bodies including both surface and groundwater. In most cases, this information can be obtained from the local weed control board.

If there are any questions on any of these comments, please feel free to give me a call at (701) 224-2354.

Sincerely,

Dennis Fewless
Environmental Scientist
Water Supply & Pollution Control

DF:ire

4.1

4.1) The best management practices to reduce erosion and sedimentation will be used in accordance with BLM policy, Section 208 of Public Law 92-500, and the State 208 Program.

4.2

4.2) A herbicide use plan will be prepared which will address environmental concerns before application of herbicides. (See also response 3.1.)

Reading

Central

Environmental Enforcement 701-224-3234	Environmental Engineering 701-224-2348	Environmental Sanitation 701-224-2382	Environmental Waste Management & Research 701-224-2366	Water Supply & Pollution Control 701-224-2354
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United States Department of the Interior

NATIONAL PARK SERVICE

Theodore Roosevelt National Park
Medora, North Dakota 58645
(701) 623-4466

RECEIVED

BLM - Bismarck District

APR 11 1984

Reading _____
Central _____

IN REPLY REFER TO:

L7619

April 10, 1984

R. Craig Altop, Project Manager
Bureau of Land Management
P.O. Box 1229
Dickinson, ND 58602

Dear Mr. Altop:

We appreciate the opportunity to comment on the BLM draft North Dakota Grazing Environmental Impact Statement. Thank you for providing the park with a copy.

We concur with your selection of alternative A as the preferred alternative. However, we believe that a more comprehensive evaluation of range condition is needed before allowing any increases in AUM's. From the discussion on page 5 of the plan, target stocking rates are unvaried by monitoring or evaluation, and as a consequence present resource condition is unknown. Further, on page 6 monitoring is discussed as a one time inventory. One time inventories do not monitor resource status changes, and may be conducted in other than "average" or normal conditions, thereby giving false indications of resource status.

We would suggest an active monitoring program as part of Alternative A to provide for adequate management of the range. The availability of 25% of the total annual vegetation production for livestock use seems a sound goal, though monitoring for localized overuse should be part of your management strategy. Riparian areas, critical to many wildlife species, are often overused by livestock, and some form of protection or special management should be afforded these.

Finally, leafy spurge control is proposed, and without being completely familiar with the situation, we might suggest control of other exotics, such as Canada thistle, if it is a problem on BLM lands.

Again, we encourage adoption of Alternative A (Rangeland Improvement) as your agencies grazing plan in this area, provided the necessary baseline resource data and subsequent monitoring is provided. Thank you for involving us in your EIS process.

Sincerely,

Harvey D. Wickware
Superintendent

5.1

5.1) Ecological range condition was determined using information from surveys, inventories, and professional judgment. Stocking levels are initially established based on professional judgment, BLM's Missouri River Basin Study data and standards contained in SCS technical guides and handbooks. We agree that one-time inventories do not reflect resource changes, only resource conditions under the stocking rates being used. The validity of these stocking rates is, therefore, determined by periodic monitoring of utilization and ecological trend. As stated on page 6:

"Current BLM policy emphasizes the use of a systematic monitoring program to verify the need for livestock adjustments proposed on the basis of one-time inventory data. Monitoring will also be used to measure the changes brought about by new livestock management practices and to evaluate the effectiveness of management changes in meeting stated objectives."

A monitoring program is an integral part of Alternative A, as are special management considerations for high value habitat critical to wildlife where it is identified through monitoring and evaluation.

5.2

5.2) Leafy spurge is known to occur on twelve of the tracts of land administered by BLM. Where other noxious weeds are identified, control efforts will be coordinated with the appropriate county weed control offices and in accordance with Bureau Policy. (See responses 3.1 and 4.2.)

NORTH DAKOTA GAME & FISH DEPARTMENT

"Variety in Hunting and Fishing"

2121 Lovett Avenue
Bismarck, North Dakota 58505
Phone: (701)224-2180

RECEIVED

BLM - Dickinson District

APR 13 1984

Reading _____
Control _____

April 6, 1984

Mr. Mike Penfold, State Director
Bureau of Land Management
P.O. Box 30157
Billings, Montana 59107

RE: Draft North Dakota
Grazing Environmental
Impact Statement

Dear Mr. Penfold:

We have reviewed the above referenced draft document. Our comments are segregated into two groups: 1) Six categorical comments on the document in general 2) a detailed comment and question section (attached). Categorical comments follow:

1) The EIS fails to appropriately segregate allotments and land parcels into groups or categories according to similarities and differences in size, location, available surface resource data, existing management situations, and management problems and potentials. As a result, it is difficult if not impossible to determine precisely what management activities are proposed for which lands.

This failing not only makes the document confusing and overly general, but precludes identification and meaningful discussion of management alternatives specifically designed to meet the needs of differing groups of lands.

This fundamental shortcoming creates several of the remaining general deficiencies.

2) Primarily as a result of item 1, the EIS does not present a set of reasonable, feasible alternatives. Instead, with the exception of preferred alternative A, there is some element or aspect contained in each of the other three alternatives which makes them either uneconomical, unreasonable, or not legally possible, as in the case of alternative D. This amounts to making the document "loaded". Even if a reviewer has strong objections to the preferred alternative, it becomes, by default,

6.1) Grazing allotments and other land parcels were categorized according to: range condition class, grazed/ungrazed, leased/unleased, and suitable/unsuitable for grazing. Allotments were also screened for one of three possible management categories: improve, maintenance, or custodial.

Dale L. Henegar
COMMISSIONER

Charles H. Schroeder
DEPUTY COMMISSIONER

the only possible selection. The titles assigned to the alternatives are in themselves prejudicial—how could anyone be against an alternative calling for rangeland improvements? While we acknowledge BLM's prerogative to provide summary titles for alternatives and to select a preferred alternative, it is obvious that the other alternatives are simply benchmarks (B, D) or intentionally displayed as impractical (C).

3) The data base for rangeland and wildlife resources is minimal and largely inadequate to appropriately determine management direction and assess environmental consequences. The available surface resource data has been stretched beyond credible limits and relies heavily on assessments and questionable, subjective opinions for support. The attached specific comments point out numerous instances of this.

We recognize the historic funding and manpower constraints under which BLM has been forced to operate and the degree to which this is responsible for this lack of data. None-the-less, we do not feel BLM has provided sufficient data on range conditions, wildlife populations, wildlife use, and locations and numbers of sites where rangeland improvements are needed to justify the preferred alternative.

The understandable, but unfortunate shortage of actual data, creates credibility problems, constrains insight to the existing management situations, and forces the use of numerous undesirable, subjective generalizations in the EIS.

4) The EIS fails to consider the consequences of the current land base adjustment program and fails to discuss future management options for tracts not disposed of or for areas where consolidation of lands may make AMP's practicable. In short, the numerous smaller scattered tracts of BLM land are almost categorically dismissed as unmanageable and relegated to custodial management without a consideration of other options and without a discussion of the justifications for doing so. Interagency land transfers and CMA's proposed by BLM are an excellent idea and should be related to current management problems.

These problems are again largely the result of the failings described in item 1. Without contingent plans for scattered tracts, the timing and appropriateness of committing to any course of action blanketed over all parcels is unwise.

5) The EIS provides no benefit/cost estimates and no summary analysis of resource trade-offs. While these items by themselves are not justification for any particular course of action, they are an important and useful part of the picture. We consider the inclusion of such information fundamental to an adequate EIS.

Instead the EIS defers all benefit/cost analyses to the activity planning stages. Given that wildlife resources are often shortchanged by simple B/C analyses, we believe it essential that the EIS provide comprehensive resource trade off discussions including legal mandates

6.2) The alternatives analyzed in the DEIS were developed from public input and preliminary analysis of resource data. The various components of the alternatives were designed to: 1) identify for analysis possible solutions to resource conflicts, and 2) present a range of reasonable, attainable alternatives which serve to illustrate alternative methods of resource management and the associated resource trade-offs. Development of the alternatives presented was guided by the Taylor Grazing Act, Federal Land Policy and Management Act, National Environmental Policy Act, and a court ruling on Natural Resource Defense Council et al vs. Rogers C. B. Minton et al.

6.3) See response 1.1.

6.4) The consequences of land base adjustment are not within the scope of a grazing EIS. In the BLM land use planning process all resources are considered, and various management options—including those associated with land base adjustment—are addressed.

6.5) Preliminary benefit/cost analysis will be conducted on range improvements prior to the issuance of a final decision and corresponding Range Program Summary (RPS). A more detailed economic analysis will be made following the completion of activity plans and prior to budget submissions. Both of these efficiency analyses will include a comprehensive economic analysis of resource trade-offs. The RPS and activity plans are public documents and will be available for review.

Mr. Mike Penfold
April 6, 1984
Page 3

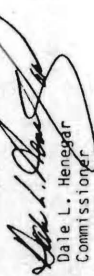
for multiple use and wildlife considerations. Otherwise, we believe overly simplistic analysis at activity planning may preclude actual implementation of wildlife protection and enhancement practices.

- 6) Improvements intended to protect or enhance wildlife habitats are proposed only in very general terms. Numbers and locations of most improvements are not given and none of the alternatives estimate costs and provide funding for wildlife activities.

Because habitats and their dependant wildlife populations are the surface resources (other than livestock forage) most significantly impacted by livestock grazing, it is essential that a grazing EIS specify measures which will be taken to protect these resources. In our opinion the lack of data on wildlife resources (as discussed in Item 3) is largely responsible for the failure to specify corrective actions needed.

In summary we believe the draft as written is unacceptable. Because of the format used by the authors and the numerous items needed to be added, we request a rewrite of the draft document. When accomplished this draft should again be distributed for public input.

Sincerely,



Dale L. Henegar
Commissioner

encl.
ah

6.6

6.6) Improvements intended to protect or enhance wildlife habitats will be implemented where, necessary as indicated by monitoring and further evaluation. Some areas have been identified where improvements are needed (for example, modifying net wire fencing in Bowman County). Other wildlife habitat improvements related to grazing management will be made based on monitoring, and in coordination with the lessee and North Dakota Game and Fish Department. Improvements not necessitated by grazing management will be implemented through appropriate activity or project plans specific to the resource.

North Dakota Game and Fish Department
Specific Comments and Questions Relative to BLM's
Draft North Dakota Grazing Environmental
Impact Statement

Chapter 1. - Purpose and need.
Pages 1 & 2 - Setting

This portion should be expanded to more accurately detail the existing management situation. Somewhere the EIS should describe specific impacts which have resulted from past grazing management, consider the history of grazing on public lands, and discuss successes and deficiencies in past management on these lands. This section or the following would seem the appropriate place for such a discussion. A reader unfamiliar with BLM lands would have little idea of the problems being addressed in the EIS or the reason for proposed management changes. Proposed land adjustments, their purpose and need, and how they may affect the management setting should also be discussed.

6.7

6.7) Providing general historical information is not within the scope of this DEIS. Generally, BLM lands in North Dakota were not intensively managed for grazing by BLM until 1966-67, when AMPs were developed in Bowman County. The remaining lands have not been intensively managed by BLM.

Pages 2 & 3 - Management Guidelines and Resource Condition.

If, as the title of this section indicates, resource condition is to be discussed, where is it? The final paragraph typifies the vague statements and diffusion which plague the entire EIS. If in fact HMP's, WMP's, and cooperative management agreements are going to be implemented, but the types, numbers and locations have not been determined, how can an EIS be prepared? Isn't a full range of resource data needed to do an EIS? Aren't cost/benefit estimates or projections an integral part of an EIS? What if the improvements planned in the EIS prove inefficient in a later cost/benefit or resource trade-off analysis?

6.8

6.8) The title should read "Management Guidelines and Resource Coordination." Activity plans will be developed on a case-by-case basis where monitoring and further evaluation indicate the need. (See also responses 1.1 and 6.5.)

The final paragraph appears to be little more than a smoke screen. It suggests AMP's will be developed, but later says none will be. What kind of plans are "geared to address specific management objectives."? Where are they described? Such unnecessarily vague statements should be clarified and specifics provided. If specific plans do not exist, then the statements should be removed from the document.

6.9

6.9) The first part of the paragraph should read as follows:
"Following the EIS, development plans and/or activity plans will be prepared. These plans will be designed to address specific management objectives identified through monitoring. They may take the form of allotment management plans (AMPs) where feasible, habitat management plans (HMPs),
Although no new AMPs are likely, the BLM does not rule out the potential development of AMPs should existing land ownership patterns and ranch operation change to favor AMP development."

Page 3 - Monitoring and evaluation

This entire section is vague and misleading. Following an opening "motherhood" statement, the rest of the section gives one the impression that BLM is capable of and actually intends to do very close monitoring and evaluation of all tracts. Is this true? Isn't intensive monitoring and evaluation impractical for many, if not most, custodial tracts? Monitoring and evaluation must be followed by

enforcement and management adjustment. How has and does BLM propose to do this for unfenced tracts which are part of larger privately run pastures?

6.10

Chapter 2 - The Alternatives.

Page 5, paragraph 3 - The assumption that proposed AUM's and stocking rates are valid should be supported by data and then supplemented by professional opinion, if necessary. How can AUMs and stocking rates be assumed valid where there is no control over livestock use on unfenced tracts? Here the author's employ what we consider to be an inappropriate, misleading method of describing vegetative uses and allocations. Expressing estimated or targeted livestock use as a percentage of total vegetative production is meaningless in evaluating range condition or any other livestock management parameter important in a grazing EIS. According to all range experts we have consulted, livestock use, stocking rates, and AUM's should be expressed and evaluated in terms of available livestock forage.

6.11

Even more perplexing is the use of AUMs (29,253) to express the amount of vegetation available for unspecified non-livestock uses. It is our understanding that an AUM defines the amount of forage needed to sustain specific types and numbers of livestock. How can vegetation which is unavailable or unpalatable to livestock or essential to plant maintenance be considered equivalent to livestock forage? It appears the only purpose served by this method is to create the illusion that wildlife and non-consumptive uses of vegetation are being allocated more than a fair share. The question is not whether cows eat trees, it is whether or not there is proper use of palatable plant communities.

Page 5 - Management guidance common to all alternatives.

If none of the allotments are categorized as 1 (allotments managed to improve conditions) and 85% of the allotments are rated in good to excellent condition (page 11), BLM will have trouble justifying the \$160,000 proposed for the preferred Alternative (range and improvement).

6.12

Page 6 - Implementing changes in allotment management.

Livestock use adjustments:
This entire section is vague and misleading. While monitoring, evaluation, and adjustment of livestock use may be possible and feasible on the ANPs, this section makes it appear that livestock use adjustments are feasible on all tracts. We do not believe this is true on many, if not most, of the small scattered, unfenced tracts.

6.13

This section points out the need to address specific allotments or groups of allotments separately. Shouldn't range improvements be sub-

6.10) Monitoring efforts are conducted at levels appropriate to the apparent resource condition, capability, and manageability. Intensive monitoring will be conducted only where resource needs or management objectives warrant. Monitoring and evaluation are followed by enforcement and grazing use adjustment only where management objectives are not being met or violations are occurring. Cooperation with the lessee is the favored method to be used to accomplish management adjustments on BLM-administered lands.

6.11) Stocking rate figures represent authorized licensed use. Actual use may vary but range condition on BLM lands (85 percent good-excellent condition) indicate that actual use is not and has not exceeded licensed use for the most part. (See also responses 1.1, 1.3, and 3.1.)

6.12) Allotments are categorized by matching resource values, manageability, and effectiveness of management options. Categorization is a tool to prioritize management efforts and funding and to highlight problem areas. Expenditure of funds is not dependent nor is it totally justified by categorization (Custodial, Maintenance, or Improve). Funds can be identified and expended on allotments in any category if justified.

6.13) See response 6.10.

ject to economic analysis in the EIS? BLM has left the question of livestock use adjustments and economic analysis unjustifiably open-ended. Based on this section BLM can do what it chooses to do or not to do. No problems are identified and no solutions are offered.

6.14

Alternatives: (Chapters 2 & 4)

Our review, comments, and questions on alternatives cumulatively address the general description of each alternative given on Pages 6-10 (Chapter 2) along with the environmental consequences (Chapter 4) for each alternative.

Alternative A: Rangeland Improvement and Environmental Consequences.
Pages - 6, 7, 25, 26, 27 & 28.

Pages 6 & 7 -

Although this general description of Alternative A calls for rangeland improvements, it does not specify the numbers or locations of improvements and fails to segregate allotments into groups or categories which allow the reader to understand where improvements are planned and, therefore, what benefits and/or negative consequences might be expected. Where will grazing systems be implemented? Where are the unleased lands? Are all unleased tracts currently ungrazed? Where will improved management and use supervision result in improvement of riparian and wooded areas? Where are the 200 acres of leafy spruce to be controlled? Where are the 600 acres of land treatments to be implemented? Will the proposed treatments actually provide 450 more AUMs on 600 acres of lands which are classified in good to excellent condition? Why were these lands not classed as needing improvement (Class I)? Where will management fences be built? Where will 12 miles of existing fences be modified? While chapter 4 does identify some general locations for improvements, only a vague description of where and what is planned is presented.

Page 25 - Vegetation.

Checking briefly through Appendix G, we were unable to locate anything close to 3000 acres of unleased, ungrazed lands. The additional 750 AUMs attributed to these lands appears questionable. Isn't this really a bookkeeping improvement?

6.16

Referring back to Page 7 where Alternative A estimates a \$160,000 cost for implementing range improvements, it follows that this expenditure will net only 733 AUMs, primarily in the three AMP's. This would equate to \$218 per increased AUM on range classed as already in "good to excellent" condition. Something is wrong here.

6.17

6.14) See responses 6.5 and 6.8.

6.15) Grazing systems would be implemented where needs are identified through monitoring (see DEIS p.7). Unleased lands and unauthorized grazing areas are identified in Appendix G. Identification of riparian and wooded areas in need of improved management and use supervision will be identified through monitoring. Due to factors such as topography, pasture configuration, or distance from water, these areas on BLM land are mostly in good or better condition. Leafy spruce control would be implemented on tracts in McHenry and Williams counties. Locations of these tracts are appended. The 600 acres of land treatments would be carried out in the three AMP areas in Bowman County (see DEIS p. 25). Based on existing land treatments in the AMPs and similar areas in Montana, these land treatments will increase range carrying capacity significantly. These land treatments will enhance wildlife habitat and livestock forage to a level higher than they are presently capable of attaining. These lands are not categorized as "I" because they do not meet the criteria applied. Management fences will be built where monitoring indicates the need.

6.16) See response 2.1.

6.17) Range improvements are not solely for the benefit of livestock but for the benefit of wildlife, watershed, and recreation as well. Only \$60,000 in expenditures are actually proposed for "conventional" range improvements. The remaining \$100,000 are for leafy spruce control, a serious problem in the state and an increasing problem on BLM lands. (See Appendix A of the DEIS)

Page 26 - Wildlife

It is difficult to see how making an additional 1,438 AUMs available for livestock can benefit or increase local wildlife populations. To the contrary, making available the 750 AUM's attributed to unleased, ungrazed lands would be detrimental to wildlife and should be considered a negative environmental consequence.

While numerous wildlife benefits are purported, the details provided are insufficient to give any reasonable assurance that improvements which actually benefit wildlife will be implemented. Further, as we understand it, no costs for wildlife improvement are included in the \$160,000 cost for this alternative. All additional improvements would be subject to and prioritized by benefit/cost analysis (see pages 3 & 6). In our opinion it is highly unlikely that benefit/cost ratios will allow any practice which constrains or reduces livestock use, even though such livestock use may be detrimental to critical wildlife habitats to be implemented. If specific improvements are needed to adequately protect critical wildlife habitats, then they should be identified and funded upfront.

If BLM does not have sufficient data to estimate the number, types, and costs of improvements needed to protect important wildlife habitats, then from a wildlife perspective this alternative and the entire EIS would have to be considered totally inadequate.

Page 27 - Recreation

Wildlife related recreational use of BLM lands is probably unquantifiable. If, however, the condition of BLM lands is as good as the EIS claims, we would expect hunter use to equal or in some cases, such as in the Lost Bridge area, greatly exceed average hunter use for other North Dakota lands with comparable habitat types and land uses.

We strongly disagree with the final statement in this section. Generally, intensive livestock use, such as BLM lands are subjected to, and posting (either illegal or defacto) of such lands greatly restricts and in many cases eliminates wildlife-related recreation. One gets a more realistic picture if one imagines the difference in wildlife populations and hunter use on BLM lands which would result if these lands were managed exclusively for wildlife purposes as opposed to present custodial management with unmonitored livestock use.

While we do not see many realistic possibilities for enhancing wildlife-related recreational opportunities on most custodial tracts, it is none-the-less troublesome that BLM does not even acknowledge the substantial impact of livestock use on recreation potential. When such impacts go unrecognized, we wonder how objectively all options have been considered. Although access will continue to be difficult, recreational opportunities on tracts in the Lost Bridge area, if fenced and properly identified, could be greatly enhanced.

6.18) Additional AUMs would be made available to livestock through range improvements and improved range conditions. This would benefit wildlife because stocking rates for livestock would remain the same, while 75 percent of an increased vegetation base would be available for wildlife and other nonconsumptive uses. All BLM land suitable for grazing is generally made available to livestock unless specifically withdrawn.

Wildlife benefits would be realized through water development, land treatments that increase vegetation and cover, and fence modifications which are solely for the benefit of wildlife.

No crucial wildlife habitats in need of protection were identified during inventories or during scoping when this information was solicited. Therefore, no specific projects have been identified at this time. Projects may be identified as more information is gathered during monitoring.

6.19) This comment is not within the scope of a grazing EIS. Recreation access to BLM lands is covered under land use planning. The BLM does not use fences for the purpose of land identification due to the obvious hazards placed on wildlife. In addition, fences would hinder free movement of the public unnecessarily and would require prohibitively high expenditures for construction and maintenance. (See also 6.4.)

Page 27 - Economic Impacts.

6.20 Our only comment is to point out the questionable economics of spending \$160,000 to increase AUMs by 733 with no quantifiable benefits to wildlife or any other public use or purpose. If this alternative is to survive cost/benefit analysis, it appears BLM must clearly identify, and quantify additional benefits. Otherwise, this alternative proposes a public investment of \$160,000 to benefit three ranches, all of which will continue to lose money on every cow produced (according to Tables B-4 & B-5).

Alternative B- No action - continuation of present management and environmental consequences. Pages 7, 28, 29.

6.21 The manner in which this alternative is presented makes it seem ridiculous. Why is this? Wouldn't BLM, even without additional leasing and improvements in the existing three AMP's, as proposed in Alternative A, still be required to monitor and evaluate range conditions and adjust livestock use? Is this alternative presented simply as a benchmark? Wouldn't BLM be compelled to control leafy spurge under any alternative? Is this current management? If so, it does not coincide very well with earlier EIS assessments of purpose and need which describe range conditions and wildlife habitats as being in good or better condition. Why fix it if it works so well?

Page 28 - Wildlife

6.22 Statements relative to conflicts between livestock and wildlife habitat make it appear that problems do not exist, but may develop. This is obvious hedging on BLM's part. Either habitats are being impacted and warrant corrective livestock management or they aren't and don't. BLM cannot have it both ways. Existing livestock use has been in place long enough now that virtually any and all conflicts with wildlife habitats which could occur are occurring. Why is BLM so reluctant to acknowledge that livestock concentrations, overstocking, and chronic depredation in woodlands are currently causing undesirable habitat conditions which are in need of correction? Stating the problem clearly and openly would seem to strengthen the rationale for making rangeland improvements under BLM's preferred alternative.

Alternative C: Reduced livestock use and environmental consequences.

Pages 7, 8, 29, 30, 31.

Earlier the EIS states (page 5 paragraph 3) that current stocking rates are only assumed to be correct and should be considered targets. Without detailed, site specific data and information on range conditions and wildlife resources, we wonder how BLM can claim that the very modest long term reduction (8%) in livestock use proposed in this alternative places emphasis on watershed and wildlife resources.

6.20 Tables B-4 and B-5 are correct but do not show the operators losing money. The "loss" represents a comparison between the return on cattle versus what could be earned by investing elsewhere. In other words this "loss" is what the operator "pays" for being self-employed as a rancher in terms of foregone investment opportunities. (See also responses 6.17 and 6.18.)

6.21 Alternative B is presented as a requirement of law and Bureau Policy. The intent is to show the effects of no change in present grazing management practices. No improvements would be allowed, monitoring would remain minimal, and leafy spurge control would not be implemented.

6.22 BLM inventories and contracted studies did not identify any specific serious conflicts between livestock and wildlife habitat on BLM lands. BLM maintains that conflicts may develop unnoticed without monitoring and may continue if corrective management efforts are not implemented. Wildlife populations and habitat conditions are temporal in nature and continuously changing. Managing as if conditions were static is unrealistic. Livestock concentrations and overstocking may be causing undesirable habitat conditions which are in need of correction throughout the state; however, BLM can only correct these problems when they are on public lands. BLM inventories, site visits, and public input during scoping did not identify any significant or serious problems on BLM lands

More than likely the livestock reductions called for, based on the data presented, could well still leave livestock forage on many ranges over utilized. There is no way to judge this unless livestock use is evaluated in terms of proper use of available forage. It might be that on certain allotments 8-20% reductions in livestock use would result in range improvements with few benefits to wildlife.

The reduced AUM figures as presented are difficult to follow, but it appears that BLM has projected reduced AUM's over all allotments, AMP's, as well as, custodial tracts. If so, isn't this unrealistic and, therefore, misleading? Wouldn't reduced grazing be feasible only on AMP's and larger tracts where fencing expenses and logistics are reasonable?

In general, we concur with the assessments of the effects of reduced grazing on wildlife habitats. It would be desirable to allocate 100% of vegetation on crucial habitats to wildlife. However, unless fencing is done and AMP's are developed elsewhere, we do not see that this is a realistic possibility outside of the existing AMP's. At least the EIS does not specify where this can be done.

Alternative D: No Grazing and environmental consequences.

Pages 10, 31, 32, 33.

When considered as a management prescription for all BLM lands this alternative as presented is unrealistic, cost prohibitive, and probably illegal. We disagree with the conclusions drawn from statements concerning vegetation and wildlife habitats reaching stagnant and decadent conditions without grazing. If in fact undesirable climate vegetation or stagnation results from no grazing on certain soils, it would be possible to utilize burning, temporary grazing or other treatments to create desired vegetative conditions. In any case, we believe most ecologists, wildlife biologists, and range managers would agree that rangelands typical of western North Dakota are healthier and more wildlife productive when left ungrazed, trending toward climax vegetative conditions, than are heavily utilized rangelands with typically degraded woodlands and riparian habitats.

Pages 32 - Wildlife Conclusions - Paragraph 2.

We strongly disagree with the message implied in this paragraph. We are aware of no grazing system, which could be feasibly implemented on North Dakota rangelands, capable of maintaining wildlife numbers considerably above those present under ungrazed conditions. The implication that Alternative A, or any other feasible grazing system, will do so should be eliminated. A no grazing alternative may not be reasonable, but that certainly is not because the improvements and grazing levels planned under Alternative A or livestock use which currently exist on BLM lands are more beneficial to wildlife than no grazing.

6.23 As explained in the DEIS (p. 29), initial authorized use would be reduced 20 percent from what exists at present. In the long term, while holding livestock stocking levels at the reduced level (20 percent of vegetation production), increases in numbers of livestock could be realized because of projected increases in forage production and range conditions. This would result in long-term decreases of 8 percent in current stocking levels but an increased vegetation base and more cover and forage available to wildlife and other nonconsumptive uses. Reductions in authorized use are possible on all BLM lands with the cooperation of the grazing lessee. (See also I.1, 6.6, 6.15, 6.18, and 6.22.)

6.24 Alternative D is presented as required by court decision of Natural Resources Defense Council, et al vs. Rogers C.B. Merton, et al.

Prairie vegetation, such as is found in North Dakota, evolved and developed under grazing and browsing by wild ungulates. Studies have shown that elimination of grazing removes growth stimuli and reduces vigor, resulting in deterioration of the range condition. (See DEIS, p. 31)

Grazing systems are designed to maintain a high condition class, vigor, composition, and distribution of the more desirable range plants that are adapted to the soil and climate of the area. This contributes to the overall health of the ecosystem as well as aesthetics and value to wildlife. Incorporated into grazing systems are water developments and other range improvement projects that greatly enhance the value of an area for wildlife.

Chapter 3 - Affected Environment

Page 16 - Wildlife

This section contains a very general, inadequate description of wildlife resources. The discussion contains virtually no data and is fraught with questionable generalizations, a few of which are listed below.

Paragraph 2 - 4,000 AUM's consumed by wildlife appears to be a wild, undocumented guess at best. Again, stating that 29,253 AUM's are available to wildlife is meaningless. Discussion of wildlife potentials should concentrate on habitat conditions, carrying capacities, critical habitats, and limiting factors.

Paragraph 3 - "Resource inventories indicate that adequate cover exists on most BLM tracts to provide for cover requirements of the individuals using them." This is an extremely vague, misleading statement. Although it is literally true, and ecologically obvious, it sheds no light on actual cover/habitat conditions. Cover and general habitat quality should be discussed in reference to specific habitats and important management species such as shrubs/woodlands relative to mule deer, whitetail deer, or residual nesting cover relative to sharptail grouse.

Paragraphs 6, 7, 8 - BLM is obviously aware that hardwood draws provide highly valuable wildlife habitats which are often badly degraded by livestock use. If the intent of these three paragraphs were to discuss the value of hardwood draws and their relative condition on BLM lands, they fail miserably. The authors appear reluctant to even acknowledge the possibility of degraded hardwood draws on BLM lands.

Statements such as, "Wildlife use of hardwood draw habitats is disproportionate to their occurrence," are so vague as to be meaningless. While literally true, it is also true of virtually all habitats and sheds no light on the true value of hardwood draws to important wildlife species.

The entire hardwood discussion is without merit. The truth is many hardwood draws throughout the state are being destroyed degraded, or rendered nearly valueless for important game species by chronic livestock depredation. It is impossible to believe that numerous instances of this are not also occurring on BLM lands. Either the BLM resource inventories referenced were totally inadequate or BLM has chosen not to discuss the problem.

6.25) Figures used were based on information from and consultations with North Dakota Game and Fish (NDG&F) field personnel and NDG&F published information. Total theoretical wildlife consumption for all species is based on assumed 20 muledeer equivalents per square mile at 0.2 AUMs/muledeer. NDG&F deer herd population estimates for 1982 were used as a base figure and adjusted upward to reflect theoretical consumptive uses by all wildlife at high population numbers. It is felt that this reflects higher consumption by wildlife than actually occurs but is useful for illustrative purposes and a worst-case analysis. (See also responses 1.1, 6.3, and 6.18.)

6.26) This may be interpreted to mean that resource conditions on most BLM tracts were rated in satisfactory or acceptable condition for wildlife habitat conditions as they relate to livestock grazing. (See responses 6.3, 6.15, 6.18, 6.22.)

6.27) See responses 6.3, 6.15, 6.18, 6.22.



North Dakota Chapter

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BLM - Dickinson District

APR 12 1984

Central

THE WILDLIFE SOCIETY

Moffit, North Dakota 58560

April 11, 1984

Mr. Reed Smith, District Manager
Bureau of Land Management
P.O. Box 1229
Dickinson, North Dakota 58601

Dear Mr. Smith:

With this letter I am forwarding comments on the North Dakota Grazing Environmental Impact Statement prepared by your office. The North Dakota Chapter of The Wildlife Society (NDCTWS) is a nonprofit organization of professionals active in wildlife research, management, education and administration. We believe that wildlife and other natural resources are closely interrelated and have a permanent place in our culture. We also believe in wisely-determined uses and programs to enhance the esthetic, recreational and economic values of wildlife as part of our standard of living. The Chapter is very much interested in the wise use and management of our public lands and appreciates being kept informed of such activities.

The draft EIS setting forth management alternatives for 68,000 acres managed by BLM has been reviewed by several members with range and wildlife management expertise. The large number of tracts and tract distribution undoubtedly resulted in special problems for the individuals preparing this document. Similarly, management of these small and scattered parcels would also pose some special problems. This situation may be partially responsible for the level of detail provided in the draft EIS.

Although the area involved (68,000 acres) is relatively small in relation to the 31-county EIS area, the NDCTWS considers proper resource management of all public lands to be of high public interest. This is expressed in executive orders and various federal legislation such as E.O. 11950 (Wetlands Preservation), the BLM Organic Act, and the Federal Land Policy and Management Act.

The Federal Land Policy and Management Act of 1976 requires resource inventories which will be of considerable importance in the development of Allotment Management Plans (AMP). Although the draft EIS states that resource inventories were conducted from 1979-1983, wildlife resource information is insufficient for a comprehensive evaluation. On page 16 the following statement is made:

"Due to the dynamic nature of wildlife populations and mobility of many wildlife species, population estimates of BLM lands would be misleading and highly inaccurate."

Dedicated to the wise use of all natural resources

With this, one could assume that no inventories were done. While we agree that population data may be difficult to obtain, particularly on small tracts dispersed in 31 counties, we cannot accept the fact that AMP's will be developed without even a species list or some description and knowledge of area wildlife or wildlife-habitat associations. This is particularly true for the Lost Bridge and Big Gumbo management areas. Wildlife resource analyses should include not only wildlife values exclusively on these tracts, but also wildlife populations, wildlife habitats and habitat interspersions on adjacent areas.

We agree that small parcels with a scattered distribution, combined with low habitat value, have limited wildlife management possibilities. However, larger tracts or tracts with wildlife management potential should be given closer examination than what has been presented in this draft. No mention is made of any areas, large or small, where Habitat Management Plans (HMP) could be implemented. Are HMP's feasible on any or all of the 3,000 acres not currently being grazed? What is the present value of these areas to wildlife?

Based on range resource inventories, an estimated 29,253 AUM's are currently available for wildlife and nonconsumptive uses. The current authorized grazing use is 9,751 AUM's on 53,420 acres. Utilization was based on 25 percent for livestock with 75 percent available to wildlife and nonconsumptive uses. The draft EIS also acknowledges problems with grazing distribution. Undoubtedly, range sites associated with swales, drainages, and concave and convergent landforms experience a higher utilization by livestock than steep slopes or areas farther from water. This can also cause problems from a wildlife management standpoint. Areas which receive run-on water such as the swales, drainages and concave slopes are also important from a wildlife habitat standpoint. Better soils and moisture conditions provide environmental conditions suitable for more mesic plant species including forbs and shrubs which in turn are important to many wildlife species.

Improving grazing distribution and use of additional range management techniques will improve range conditions which can result in additional AUM's for livestock. The development of AMP's with due consideration to habitat management, however, requires not only an evaluation of the availability of AUM's but also habitat quality and wildlife-habitat associations. Both HMP's and AMP's should consider these relationships.

The amount of AUM's available to some species is irrelevant to their habitat needs. Several species present in the Big Gumbo area, for example, are sensitive to grazing pressure. Plant community vegetation structure or morphological characteristics of plants in ungrazed environments are important considerations. The accumulation of litter and the effect of this characteristic on a predator-prey relationship can be positively or negatively affected by range management plans.

The importance of idle cover should not be overlooked. We strongly recommend further consideration of developing a grazing scheme that leaves idle grassland. Based on projected increases in AUM's with Alternative A (p. 25), this could be done without negatively affecting existing authorized AUM levels. Further study

8.1) BLM has funded studies and inventories that encompassed BLM lands and also has conducted in-house surveys and inventories to determine species occurrence and general habitat conditions. Rangeland inventory procedures provide consideration for wildlife habitat condition and suitability. The responsibility of managing wildlife populations lies with the state game and fish agency. The BLM manages and makes available wildlife habitat on BLM lands but relies on the state game and fish agency for wildlife population data and management.

The EIS does not propose implementing any new AMP's at this time (see also 6.9). After the EIS, development plans and/or activity plans will be prepared on a case-by-case basis. These types of plans can include Allotment Management Plans (AMPs) should opportunities arise as well as Habitat Management Plans (HMPs) and other plans. AMPs have been developed in coordination with NDGFP on all lands where currently feasible, and no new AMPs are foreseen at this time. Identification of HMPs and other activity plans were not identified during scoping and therefore are not addressed as a grazing-related issue in this DEIS. The need for HMP's was identified in previous land use planning; further development of HMP's will be performed in close coordination with the North Dakota Game and Fish Department.

8.2) See response 1.1.

should be initiated to determine if idle grassland could complement grazing management plans with a management goal of providing idle acreages and increasing AUM levels concurrently. Grazing principles inherent in the short duration, high intensity cell grazing system (Savory Method), may be applicable to larger BLM units. This system would increase beef production per acre on grazed areas and improve range conditions by allowing idle grassland on other portions of the unit. We wish to point out that promoting idle grassland does not imply long-term idle areas. Maintaining or improving range conditions on these tracts is an important goal. We urge BLM to cooperatively work with state and federal wildlife management officials to determine how long an area should be idle. BLM should be cognizant of the possibility of plant community deterioration under long periods of nonuse or lack of management applications.

Another concern of the NDC/TWS relates to the secondary impacts that may result from increasing AUM's on a management unit. Specifically, increasing herd size may require larger winter feed supplies. This may result in the conversion of adjacent native prairie under private ownership to fulfill this requirement. The lack of winter feed is a frequently occurring and expensive problem. Consequently, the availability and productivity of existing hayland to support these increases should be considered.

To highlight the major points of discussion, the following recommendations are provided for further consideration:

1. An adequate inventory and description of wildlife resources and wildlife-habitat relationships is needed. This should describe not only the existing condition, but also the potential for improvement that may be expected from proper management.
2. A closer wildlife resource analysis is needed on the many small tracts scattered throughout the 31-county EIS area. Consideration should be given to exchanging small upland grassland areas of more value to livestock grazing for woodlands or riparian habitats of less value for livestock. Where feasible, HMP's should be developed to reflect any possible exchanges.
3. Idle grassland should be included in the range management plans. We believe this can be consistent with improving soil, range and wildlife resources.
4. BLM should consider the secondary impact of increasing AUM's and its effect on the conversion of adjacent private land to increase winter hay supplies.
5. Cooperative agreements or working contracts with the State Game and Fish Department should be considered for a holistic approach to wildlife resource management, particularly where the large tracts are involved.

In conclusion, we believe that the North Dakota Grazing Environmental Impact Statement lacks the quantitative and qualitative information needed to adequately evaluate the four alternative plans. Considering that this document is in

8.3) One method of assuring rangeland vigor is to prescribe seasons of nonuse in the grazing schedule as suggested. The BLM grazing system prescribed for an allotment will be determined following an evaluation of that allotment. Grazing systems will be prescribed to promote rangeland vigor. At present BLM does prescribe seasons of nonuse for several allotments, including the three AMPs in Bowman County.

8.4) Detailed analysis of such impacts is not in the scope of the EIS; however, the maximum projected increase of AUMs available to livestock would be approximately 733 AUMs, primarily in the three existing AMPs. This increase could translate to 122 cow units (6 months on BLM Range, 2 months on supplemental pasture), which would require winter feed (hay and supplements) for four months on the average. If the rancher had to convert rangeland or cropland to hayland (brome-alfalfa mix at one ton/acre) approximately 633 acres would have to be converted. As most of the land in the AMP area has been converted to cropland where possible, it is likely that the rancher would have to convert cropland to hayland if he did not want to buy hay to feed additional numbers of cows. He could also produce more hay on existing hayland by fertilizing or other improved farm management practices.

8.5) Exchanges of land and cooperative agreements are not in the scope of this EIS. They were addressed in the management framework plans which, in part, served as a basis for this DEIS. (See also 2.2 and 6.4.)

response to a Natural Resource Defense Council lawsuit and subsequent court order directing BLM to evaluate the environmental effects of grazing on the public lands under their jurisdiction, we are disappointed in the product. In our opinion, this document, unless significantly revised, will only lead to further litigation which will be costly, time consuming and likely delay rangeland and wildlife habitat improvements.

If BLM needs clarification on any of our comments or wishes to discuss them in further detail, please do not hesitate to contact me. The MDCTMS appreciates the opportunity to comment on this draft EIS.

Sincerely,



Mike McEnroe
President



United States Department of the Interior

FISH AND WILDLIFE SERVICE
1500 CAPITOL AVENUE
BISMARCK, NORTH DAKOTA 58501



RECEIVED

BLM - Dickinson District

APR 13 1984

Reading _____ Central C

MEMORANDUM

To: District Manager, Bureau of Land Management
Dickinson, North Dakota

From: Field Supervisor—Habitat Resources
Bismarck, North Dakota

Subject: Draft North Dakota Grazing Environmental Impact Statement

We have reviewed the subject Draft Environmental Impact Statement (DEIS) and offer the following comments for your consideration.

These comments have been prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and other authorities mandating Department of the Interior concern for environmental values. They are also consistent with the intent of the National Environmental Policy Act.

The Fish and Wildlife Service (FWS) supports the Bureau of Land Management (BLM) efforts to evaluate the effects of grazing on the lands under their management jurisdiction in North Dakota. Furthermore, we support continued grazing on a majority of BLM lands as a wise use of public lands, however, we believe other values and resources must also be considered. The EIS process provides an excellent opportunity to evaluate the environmental effects of various grazing options.

The North Dakota Grazing DEIS evaluates four grazing management options for approximately 68,000 acres of public lands administered by the Dickinson office of the BLM. The four grazing options being considered are:

Alternative A, which has been selected as the preferred alternative, will increase livestock animal unit months (AUM) by 15 percent (1,483 AUM's). This will be accomplished by increasing vegetation production through grazing systems and various land treatments (733 AUM's) and leasing 3,000 acres of previously unleased land (750 AUM's). If Alternative A is implemented, BLM predicts rangeland and wildlife habitat conditions will be maintained or improved.

Alternative B will "freeze" stocking rates at their current level of 9,751 AUM's. No new range improvements would be developed. BLM anticipates that general range conditions will remain static or decline due to lack of adequate monitoring or supervision if Alternative B is implemented.

Alternative C will allow for continued grazing on the areas currently open for livestock use plus open another 3,000 unleased acres for grazing. This plan would result in an initial reduction of 1,951 AUM's and a long-term reduction of 764 AUM's. Decreased grazing pressure on lands that are currently leased will benefit wildlife resources.

Alternative D will eliminate all livestock grazing on lands managed by BLM in North Dakota. From an economic and public acceptance perspective, this option is not realistic and appears to have been added for comparison purposes only.

General Comments

In general, we believe that this DLIS does not provide sufficient baseline data to adequately evaluate the alternatives. The only inventory data cited in the DEIS is based on monitoring studies conducted by BLM from 1979 to 1982. Data collected during this effort suggests that 85 percent of the lands managed by BLM in North Dakota are in good to excellent condition, 7 percent fair and 8 percent unclassified. By comparison, the Soil Conservation Service reports that 60 percent of private rangeland is in good to excellent condition and 39 percent is in fair to poor condition. The DEIS does not provide information concerning the techniques used by BLM or the extent of their inventory efforts. From our perspective, detailed baseline inventory data is required to evaluate the alternatives and make sound resource management decisions.

With respect to wildlife habitat, if the preferred alternative is implemented, BLM predicts that conditions will improve by giving special consideration to protecting crucial habitats and wintering areas. However, these areas are not identified. We recommend that inventories documenting the condition and location of wildlife habitat on land managed by BLM be conducted. A description of the inventory methods and the site-specific results from these studies should be included as an integral part of the DEIS.

The FWS will gladly assist in the development of a sampling scheme to assess wildlife habitats. In general, we suggest concentrating on identifying the conditions of the following habitat types: wetlands, woodlands, in particular hardwood draws and riparian zones. After baseline conditions are determined, specific management plans should be developed to protect and enhance these habitats where feasible.

Other specific comments follow. These comments are offered to assist in your evaluation effort and biologically strengthen this assessment.

9.1

9.1) The rangeland condition class statistics reported by SCS reflect ecological condition overall on all private rangelands in North Dakota. BLM's rangeland condition classification is specific for BLM lands only. The difference between BLM and SCS statistics reflect topographic differences between most BLM land and private lands, soils capability, geographic location, accessibility to livestock, and historical grazing use. SCS statistics were included to depict general statewide rangeland conditions and point out that, based on SCS findings, rangeland conditions are improving statewide. BLM uses approved methods as prescribed in BLM manuals, and experienced personnel conduct rangeland surveys. Rangeland surveys take into account wildlife habitat conditions and suitability. (See also response 6.3.)

9.2

9.2) See above response and responses 6.3, 6.6, 6.18, and 6.22.

Specific Comments

Page 5, The Alternative - BLM has assumed that the AJM and stocking rate figures used in the DEIS are valid. This assumption was based on limited data on vegetation and production. This data is essential for making biologically sound decisions concerning the environmental effects of grazing. Without thoroughly documenting existing rangeland conditions, we do not believe that this DEIS can be considered complete.

9.3

9.3) See responses 1.1, 5.1, 6.1, 6.3, and Appendix E of the DEIS.

Page 5, Allotment Categorization - All grazing allotments in the Dickinson District are currently managed to maintain current conditions or prevent resource deterioration. No allotments are being managed to improve resource conditions. With a minimum of 3,995 acres of rangeland in fair condition, we recommend identifying the location of these lands in the DEIS and developing a detailed plan to improve rangeland conditions.

9.4

9.4) See DEIS, Appendix E for location of lands. Plans to improve rangeland conditions based on manageability, capability, etc will be prepared after monitoring and evaluation. (Also see responses 6.6, 6.10, and 6.12.)

Page 6, Alternative A: Rangeland Improvement - Under the preferred alternative, management emphasis will be "placed on areas identified as being in less than good range condition, areas where use patterns of livestock and wildlife conflict, and areas where rangeland potential is high". The FWS concurs with this direction. With limited funding available for rangeland and wildlife habitat improvements, efforts need to be concentrated where potential for improvement is high. The areas that are in fair to poor condition or where wildlife and livestock conflict, need to be identified in the DEIS.

9.5

9.5) No specific crucial wildlife habitats in need of protection were identified during the inventories or scoring when this information was solicited. See DEIS, Appendix E for areas in fair condition. (See also responses 6.18, and 6.22.)

The DEIS goes on to conclude that by implementing Alternative A, "wildlife habitat would improve with special consideration given to protect crucial habitat and wintering areas". However, the special considerations, crucial habitats or wintering areas are not clearly identified. This information also needs to be included as a part of this analysis.

9.6

9.6) Crucial areas such as key winter grounds need to be identified and defined through monitoring and evaluation. Special considerations for management will be developed based on needs identified through monitoring. (See also response above, and 6.15, 6.18, and 6.22.)

Page 7, Alternative A: Rangeland Improvement - Three thousand acres of unleased land would be brought under grazing permits if this alternative is implemented. Appendices G and H identify the locations of unleased lands in the West River and East River Resource Areas. The vast majority of these areas are under 80 acres in size, thus limiting wildlife management possibilities. We recommend identifying the tracts which will be leased under Alternative A. The value of these lands for wildlife resources depend on the size and location of these tracts, the habitats present and their proximity to other lands dedicated to wildlife habitat management.

9.7

9.7) Unleased tracts are identified in Appendices G and H. All BLM lands suitable for grazing are available for grazing under lease.

Page 26, Wildlife - The DEIS states, "Livestock and wildlife management can be compatible". Depending on the species of management concern, we agree. In fact, overgrazed, poorly managed sites are preferred by certain species; e.g., horned larks. A wealth of scientific literature documenting the environmental effects of grazing is available. This source of information should be used to support the conclusions reached in the DEIS.

9.8

9.8) BLM does not imply that grazing management automatically leads to good wildlife habitat management and production. Our objective in grazing management is the establishment of grazing systems or the assignment of livestock numbers and season of use that are compatible with the forage available, and which do not maximize forage utilization at the expense of other resources such as wildlife habitat or watershed protection. (See also responses 3.5 and 6.24.)

BLM is aware of the vast amounts of literature pertaining to grazing and grazing management. Professional judgement and analysis are based on knowledge of findings and theories presented in the literature as well as personal professional experience.

The DEIS briefly describes land treatments which include wildlife consideration. "Interseeding and contour plowing would include in the seed mix forbs and shrubs beneficial to wildlife." The species to be included in the seed mixture should be identified in the DEIS. If shrubs are to be planted, as described, those areas will need to be fenced to prevent soil compaction and provide protection from livestock trampling and foraging. A 2-year period is simply not a sufficient period of time for shrub species to become established.

9.9 Page 26. Conclusion - BLM concludes that in the long-term, wildlife habitat would improve on 38,000 acres as a result of improved grazing management. Significant habitat improvement on over half of the lands managed by BLM in North Dakota is a commendable goal. The method for determining this figure needs to be explained. The estimated cost for implementing Alternative A "does not include costs for range improvements, fencing of water sources for wildlife needs (which have not been identified), or development of wildlife water sources, which would be identified through monitoring". Information concerning funding sources and a time table for implementation should also be included in the DEIS.

9.10 In summary, we believe that the EIS process provides an excellent opportunity to evaluate the environmental effects of grazing. As suggested in our September 1, 1983, memorandum, a combination of the strategies outlined in the four alternatives may best serve the public's social, economic and environmental needs. Depending on rangeland conditions, certain areas or habitat types may allow for additional grazing while other sites may require a reduction in the number of AUM's allowed. As the first step towards a balanced grazing management plan, the existing rangeland and wildlife habitat conditions must be documented. Without this baseline data, we do not believe that the Draft North Dakota Grazing EIS provides adequate information to evaluate the four alternatives. Therefore, we request that BLM prepare and circulate a revised DEIS. This office is willing to assist BLM in developing a multiple-use grazing management plan, which improves public land resources including soil, water, vegetation and wildlife habitat.

9.11 Thank you for this opportunity to provide comments. If further information or assistance is needed, please contact Bill Bicknell or Roger Collins at 255-4011, ext. 492.

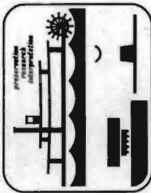
M. J. Zecher

cc: ARD-HR, Denver
(Attn: D. Hoffman)
ND Game & Fish Dept.
(Attn: K. Sambor)

9.9) Identification of species that would be used in the seed mixture would be premature at this time. This will be addressed at activity planning time. Seed sources and available species are variable, with new releases or sources becoming available periodically. A two-year period is often enough time for many shrub seeds planted in contour furrows to become established. Additionally, monitoring of seeded areas would provide information on rate of establishment and success of the seeding. Grazing would not be allowed if success of the seeded stand would be jeopardized.

9.10) The total acreage of the three-AMP area and the Lost Bridge area is approximately 38,000 BLM acres. As these areas are relatively large blocks of land, BLM has more management flexibility to implement grazing management practices that will show positive benefits for wildlife.

9.11) This information would be developed during activity planning. (See also responses 6.5, 6.6, 6.9, 6.15, and 6.18.)



State Historical Society

of North Dakota (State Historical Board)
North Dakota Heritage Center, Bismarck, N.D. 58505
Telephone 701-224-2672

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BLM - Dickinson, ND

FEB 23 1984

Reading

Central

IN RESPONSE PLEASE REFERENCE: 84-138.

February 17, 1984

Raymond C. Altop, Project Manager
Bureau of Land Management
P O Box 1229
Dickinson ND 58601

RE: Draft North Dakota Grazing Environmental Impact Statement.

Dear Mr. Altop:

We have reviewed the above referenced Draft Environmental Impact Statement. It is our opinion that the document adequately addresses cultural resources by providing for surveys of proposed development areas and appropriate consultations to plan mitigation in instances where significant cultural resources will be adversely effected.

Thank you for providing us opportunity to review the Draft of this document. If you have any questions regarding these comments, please feel free to contact Mr. C. L. Pill of our office at (701)-224-2672, or in writing.

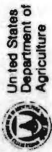
Sincerely,

James E. Sperry
State Historic Preservation
Officer (SHPO)

/cid

10.1 No Response

10.1



Soil Conservation Service

P. O. Box 1458
Bismarck, ND
58502

April 12, 1984

Mr. Raymond C. Altop
Project Manager
Dickinson District Office
Bureau of Land Management
P.O. Box 1229
Dickinson, ND 58602

RECEIVED

BLM Bismarck District Office
APR 13 1984
Bismarck, North Dakota

Dear Mr. Altop:

The Soil Conservation Service in North Dakota has reviewed the Draft Environmental Impact Statement (EIS) outlining four major alternatives for managing grazing on public land administered by the Bureau of Land Management (BLM) in North Dakota. We have the following comment:

We support your selected Alternative A for managing grazing on BLM lands in North Dakota.

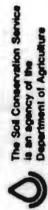
We appreciate the opportunity to comment.

Sincerely,

J. Michael Nethery
J. Michael Nethery
State Conservationist

11.1 No Response

11.1





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET

DENVER, COLORADO 80295

APR 24 1984

Ref: 8PM-EA

Raymond C. Altop
Project Manager
Dickinson District Office
Bureau of Land Management Agency
P.O. Box 1229
Dickinson, North Dakota 58602

Dear Mr. Altop:

The Region VIII Office of the Environmental Protection Agency has completed its review of the North Dakota Grazing Draft EIS and offers the following comments for your consideration.

We support Alternative C as the environmentally preferred alternative because it is more responsive to improving water quality in the region. Alternative A stresses additional production and grazing without fully justifying the need nor the economic returns. Alternative C would also better improve vegetation in riparian areas, around reservoirs and on erosion susceptible areas. If Alternative A is adopted, we recommend adopting additional measures from Alternative C to improve water quality, water yields, and better protect riparian areas.

According to the system EPA uses to rate draft EIS's, the North Dakota Grazing draft EIS will be listed in the Federal Register as LO-2. This means that although we have no significant objections to Alternative A, we ask you to consider Alternative C, either in whole or least in part, to better improve range and water quality. If you have any questions, please contact Dennis Schockl at FTS 327-4831.

Sincerely yours,

Dale Vodehnal, Chief
Environmental Assessment Branch

12.1

12.1) No Response

1"

