

October 18, 2005

Dave Pieper
Grasslands Supervisor
Dakota Prairie Grasslands
240 W. Century Avenue
Bismarck, ND 58503

Re: Interim Livestock Portion of Record of Decision for Dakota Prairie Grasslands and Proposed Demonstration Project

Dear Mr. Pieper:

The National Grazing Committee of the Sierra Club finds it timely and imperative to comment on behalf of our 700,000 members nationwide, and the public interest as regards the Dakota Prairie Grasslands (DPG) initiative to prolong and politicize the Interim Decision on the Grazing Portion of the Dakota Prairie Grasslands Land and Resource Management Plan and Final Environmental Impact Statement. Further foot-dragging on implementation of the grazing portion of the DPG Plan does not reflect the conclusions of the *Report of the Scientific Review Team*, nor does it benefit the Grasslands resource.

It has come to our attention that an open-ended DPG Demonstration Project is in draft form. We question why introductory paragraphs citing the Scientific Review Team (SRT) *Conclusion* and the query “Are grazing levels in the sample AMPs similar to those projected in the Final Environmental Impact Statement (FEIS)?” are called up as support for the proposed Demonstration Project. The Draft continues: *the SRT stated, ... “it is impossible to determine whether the projected stocking rates are appropriate to meet management goals and objectives.”*

This portrayal is out of context. The SRT *Conclusion* actually reads, “Based on information provided, it is our opinion that the proposed stocking rates in the sample AMPs are comparable to those projected in the FEIS. However, it is impossible to determine whether the projected stocking rates are appropriate to meet management goals and objectives. The projected stocking rates are based on too many assumptions when estimating carrying capacity and are coupled with resource management goals that will be difficult if not impossible to achieve.”

Sierra Club staff and a member of this committee attended SRT meetings. Even within the confines of polite Midwestern mores, the Team’s concerns with Grazing Associations’ seeming unwillingness to share pasture specific grazing records, actual stocking numbers, and management tactics and strategies are clear:

Issue IV – 1: The absence of historical pasture-specific grazing records limits evaluation of the past effects of grazing strategies.

Determining what effect any treatment has, in this case grazing, without knowing what treatment was applied is impossible. Accordingly, one cannot judge the effectiveness of past, present, or future grazing plans unless the details of the grazing regime are known. The SRT understands that certain parties have what they perceive as valid reasons for not sharing information.

However, the FS is charged with managing public lands, and FS managers must know what is happening on those lands if they are to fulfill their duties. Very often the SRT was unable to judge the efficacy of past grazing programs because critical information was unavailable.

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Issue V – 1: The absence of historical pasture-specific grazing records creates serious challenges for managers to assess past, present, and future consequences of specific grazing tactics or strategies such as kind and number of animals and time and length of each grazing event. This information is critical for assessing the consequences of any grazing strategy or tactic. The allotment-level animal data provided were of limited value in a historic assessment of stocking rates and grazing intensities, because the information did not include estimates of the size or weight of the grazing animals, accurate herd size estimates, or the timing and length of grazing events.

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Acquiescence to political pressure without assurance of genuine cooperation is not in the best interest of the ranching industry, and certainly not the resource. It appears the Forest Service, under exacting pressure, has lost its ability to avail its own successes. The Scientific Review Team gave you the go ahead, albeit with recommendations. Implement the Plan.

Furthermore, in the DPG's *Initial Position on the Scientific Review Team Report*, accompanying a letter signed by you on June 20, 2005, the Forest Service showed complete agreement with SRT Issue IV – 1 concerns, and stated, "This recommendation of sharing of records between Forest Service and Grazing Association could be strengthened and clarified in new Grazing Agreements/Rules of Management." Nationwide standardization of Grazing Agreements, clearly stating responsibilities of both agency and Association, was proposed in the recently rescinded revisions of the FS Grazing Handbook. Implementation would have helped clarify this concern. Instead, bullying by the North Dakota Congressional Delegation and issuant political pressure from within the upper echelons of your own Department void the intent of SRT efforts.

Now the DPG proposes to "Adopt a "working group" model or other collaborative approaches, such as Coordinated Resource Management (CRM), to the allotment management process at the landscape or multiple allotment level." If we are going to resolve conflict on the DPG, we need to assess all participants' willingness to compromise, willingness to negotiate, willingness to accept, rather than subvert, the rules of the process. We need to rest assured that one interested party does not drive decisions, that no singular absolutist view is the only view discussed and that no one group is out to control the process.

The National Grazing Committee is concerned that this politically motivated Demonstration Project sets unwarranted precedents that may influence agency-wide decision making. Among these concerns are:

- The open-ended timeline for final decision-making, and sunseting of the Project.
- Inclusion of the Demonstration Project in the Record of Decision for the livestock grazing portion of the DPG Plan.
- The relegation of LRMP standards relative to grazing to the status of guidelines. The July 2002 Record of Decision for the DPG states, "Standards are actions that must be followed, or set required limits to activities, in order to achieve grassland goals and objectives. Site-specific deviations from standards must be analyzed and documented in management plan amendments." A supplementary EIS and further analysis to re-evaluate findings of No Significant Impact would certainly be required.

- Non-specified modification of Goals and Objectives is also predicted. We cannot help but wonder if your agency is working from a Plan or off the proverbial cuff. The seeming lack of respect for years of staff effort and dedication in developing the DPG Plan is mind boggling. One does not garner in-the-field respect from partners and retain experienced staff with so little in-house regard.
- A diversity of cooperation and progressive range management attitudes is expressed across the DPG. The flexibility and outcomes aspired to through this Demonstration Project will be motivated by political manipulation rather than science and the resource.
- A scenario is being created wherein ranching lifestyle interests outweigh all others. And, those lifestyle interests are a self-limited elite.
- There is no specification as to actual “Working Group” participants, or to weighting of interests. Wildlife biologists, hydrologists, ecologists must balance grazing industry interests.

Grassland ecosystems are the most imperiled, least protected habitat type on Earth. The Little Missouri National Grassland is the largest national grassland in the country, and ranks near the top in assessments of focus areas for potential northern Great Plains conservation and restoration. The Sheyenne is the largest remnant of tallgrass prairie and oak savannah in public ownership and is home to the western prairie fringed orchid, a federally listed threatened species. Most of the Cedar lies within the Standing Rock Indian Reservation, while a significant portion of the otherwise contiguous Grand does likewise, increasing their relevance for meaningful protection.

It is time, and past time, for the Dakota Prairie Grasslands office to step up to the plate, finalize their Plan and implement it – before “test driving” becomes state of the State and politics swallows the ball.

Respectfully submitted,

Billy Stern, Chair
Sierra Club National Grazing Committee

Cc.
Undersecretary Mark Rey - USDA
Honorable Byron Dorgan
Honorable Kent Conrad
Honorable Earl Pomeroy
Governor John Hoeven
Chief Dale Bosworth – Forest Service