



File Code: 1920

Date: June 20, 2005

Dear Friend of the Dakota Prairie Grasslands:

The Record of Decision (ROD) for the Dakota Prairie Grasslands (DPG) Land and Resource Management Plan (commonly referred to as the "Grasslands Plan") was signed by the Regional Forester on July 31, 2002. The decision included a "phased" or "interim" decision on grazing management and established an independent Scientific Review Team (SRT) to evaluate 64 sample allotment management plans (AMPs).

The SRT presented its final report to the Forest Service (FS) in Bismarck, ND on May 20, 2005. Again, I want to thank the Team members for their efforts and the final report, which I believe will be very useful to the Forest Service in managing the Dakota Prairie Grasslands. At that meeting I committed to providing a progress report of our response to the SRT's recommendations by June 20. The attached document is our initial response to the recommendations presented in the SRT's final report.

The eight-person Team addressed two key questions posed by the Forest Service in the ROD: 1) Can the grazing portion of the Grasslands Plan be implemented? 2) Are grazing levels in the sample AMPs similar to those projected in the Final Environmental Impact Statement (FEIS).

In addressing the first question the report stated, "In general, the SRT members' comments on the sample AMP reports stated that, 'Yes, the Grasslands Plan can be implemented.'" However, the general qualifier to that statement was, "But the outcome is uncertain." I agree. Due to the nature of activities on the national grasslands and the dynamic forces frequently influencing and disturbing the land – fire, flood, wind, drought, herbivory, fossil fuel exploration and development, recreation, etc. - I believe it is quite reasonable to state the outcome is uncertain. However, by incorporating the SRT's recommendations with Forest Service data collection methods, land management activities, and monitoring protocols, the level of uncertainty should decline. Also, the Grasslands Plan planning process allows for adaptability. We can change and adapt to new circumstances and technology to meet stated Grasslands Plan goals and objectives.

The SRT answered the second question by stating, "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, they also qualified this statement by saying, "...it is impossible to



determine whether the projected stocking rates are appropriate to meet management goals and objectives.”

The collection and assessment of the best available site specific information, coupled with local knowledge, will enhance AMP development and implementation. Periodic monitoring will help the Forest Service determine if on-the-ground activities are achieving or trending positively towards stated resource management goals. And finally, management adaptability will be critical in making necessary changes when desired goals or outcomes are not being achieved or moved towards.

The SRT was also asked a third question by the DPG: Did the Forest Service use the appropriate baseline data and analysis procedures (i.e., “good science”) for sample AMP development? The Team felt the FS did not use “appropriate” baseline data for sample AMP development but did use the best “available” baseline data for sample AMP development.” It is important to note that most of the AMPs used in this process were mock-ups only, compiled quickly, and in many cases did not have the necessary detailed site specific information that everyone acknowledges is needed for actual AMP development. Throughout the review process we acknowledged this data gap and our intent to gather additional information in support of future AMP development.

The SRT recommends using Natural Resource Conservation Service (NRCS) soil series/ecological site methodology for future AMP development, assessment, and revision. We will use the NRCS methodology in a complementary fashion with our on-the-ground and assessment data until standardized methodologies are adopted by the NRCS, FS, and Bureau of Land Management (BLM).

In the ROD the Regional Forester also stated, “I will make a final decision either to adopt the grazing portion of the Revised Grasslands Plan or to make any needed adjustments or changes. Many of the SRT’s recommendations can be implemented administratively; and therefore, will not require additional environmental analysis or National Environmental Policy Act (NEPA) documentation.

However, implementing specific land management recommendations and activities, such as reducing woodland plant community expansion or expanding the use of prescribed fire, will require additional site specific NEPA documentation. Implementation of these activities will depend upon adequate funding and staffing.

Other recommendations such as addressing ecological restoration on the Sheyenne National Grassland and developing drought management strategies for the entire DPG will be addressed through collaborative processes with interested stakeholders. Specific ground-disturbing projects associated with achieving these strategies will also require additional site specific NEPA documentation.

Another Record of Decision will be issued in the coming months implementing the livestock grazing portion of the Grasslands Plan. The decision will be subject to appeal. We will finalize our response to the SRT’s recommendations prior to issuing the ROD and after determining if

any of the recommendations will require additional analysis or adjustments of the environmental documentation supporting the Grasslands Plan.

A copy detailing our initial responses to the SRT report is attached to this letter. It can also be found on-line at <http://www.fs.fed.us/r1/dakotaprairie/>.

We look forward to implementing the SRT's recommendations with our partners and cooperators to reduce the uncertainty expressed over the livestock grazing program, and to meet the Grasslands Plan's goals and objectives.

Sincerely,

/S/ DAVID M. PIEPER

DAVID M. PIEPER
Grasslands Supervisor

Enclosure