



The Izaak Walton League of America

Defenders of Soil, Air, Woods, Waters, and Wildlife

April 7, 2023

South Dakota Department of Game, Fish, and Parks
523 East Capitol Avenue
Pierre, SD 57501

RE: Prairie Grouse Action Plan, 2023-2027

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the Prairie Grouse Action Plan, 2023-2027. We understand the action plan will be used by the staff and will be formally evaluated within five years. Updates and changes to the plan will be implemented as needed.

The plan will direct wildlife managers and biologists and be used in future decision-making by the GFP Commission. The plan's goal is to assure prairie grouse and their habitats are managed properly, considering biological and social factors. The plan will inform hunters, landowners, and stakeholders interested in prairie grouse management.

South Dakota is unique as we are one of only a few states with huntable populations of both sharp-tailed grouse and prairie chickens. Outstanding prairie grouse hunting exists in South Dakota with abundant public land opportunities and walk-in areas, leased by the Department, where people can hunt grouse. We support GFP's efforts to increase hunting access in the state. Another activity that's growing in popularity is viewing prairie grouse on their leks during the mating season.

To have abundant prairie grouse numbers, we must have healthy, unfragmented grassland habitat. That habitat also benefits other wildlife, improves water quality, and reduces flooding. Young grouse need diverse native plant communities with forbs and wildflowers. Those plants hold the insects critical for chick growth and development. A well-managed prairie provides the best protection for grouse from mammalian and avian predation.

The Division supports conserving and enhancing grassland habitat that's needed for healthy prairie grouse populations. To accomplish this, we encourage expanded collaboration with private landowners and public and Tribal land managers. We believe this will develop new methods to protect and improve the state's grassland habitat. Protecting the state's remaining grasslands must be a management priority. The recent increase in the conversion of grassland to cropland has decreased South Dakota's prairie grouse and other wildlife populations.

We ask for your consideration of the following:

Priority Habitat Areas

The Division supports the tiered Priority Habitat Areas (PHA) that define prairie grouse habitat in the state. We agree PHAs will be an important tool for future prairie grouse habitat management, conservation measures, and to determine the suitability of habitat in environmental reviews.

PHAs can determine where cropland acres could be restored to grassland and where that effort would be successful. We urge the private lands habitat biologists to collaborate with landowners and implement grassland conservation practices for more quality prairie grouse habitat.

We support the following to improve prairie grouse and grassland habitat in South Dakota:

- Delay haying of grasslands until after August 1
- Spot spraying to control invasive and noxious plants.
- Control of woody encroachment
- Avoid planting trees in or adjacent to grassland areas
- Remove abandoned buildings to reduce mammalian predators

Management Objectives and Strategies

The Division supports the objectives and strategies outlined in the Action Plan. Objective 1 will promote and implement responsible stewardship of prairie grouse habitat on public and private lands. The strategies will guide habitat management and the practices needed to provide, or enhance, quality prairie grouse habitat.

Objective 2 calls for monitoring prairie grouse abundance, harvest, hunter numbers, and satisfaction. This would include the annual lek and wing collection surveys in western SD. We agree surveys are a critically important tool to fully evaluate population, age ratio, and the number of sharp-tails and prairie chickens harvested. We endorse continuing the prairie grouse hunting forecast that's based on spring lek counts and weather variables.

Objective 3 we believe is particularly important. It deals with energy development and its potential impact on prairie grouse. We encourage providing a framework for energy developers so they can avoid or minimize impacts or implement mitigation efforts for all future projects in the state. The Division supports renewable energy, but we have serious concerns on the siting of energy projects and the effect those projects have on prairie grouse and other wildlife. We urge more research be conducted on the impacts of energy projects on prairie grouse and wildlife.

Conservation Easements

The Division strongly encourages GFP to expand the use of perpetual conservation easements to protect the state's grassland habitat. We urge collaboration with the Fish and Wildlife Service and the Natural Resources Conservation Service to secure increased funding for additional conservation and grassland easements. Hundreds of South Dakota landowners are waiting to enroll grassland acres into perpetual easements, more funding is urgently needed for this effort.

Invasive Plant Species

Invasive plants pose a serious threat to South Dakota's grasslands. Invasive grasses and plants are reducing the quality of grassland habitat across the state. Smooth brome, Kentucky bluegrass, and crested wheatgrass outcompete native grasses and forbs, and alter the native plant community. Canada thistle, leafy spurge, and other invasive plants are difficult to control and can take over a grassland if not effectively managed. Control of invasive and noxious plants must be a top priority.

Woody Encroachment

Trees are rapidly encroaching on grasslands in South Dakota. Eastern red cedar, Siberian elm, and Russian olive trees are quickly spreading, especially along the Missouri, White, and Cheyenne rivers. Historically, fire controlled the spread of trees in grasslands, but the absence of fire has allowed these species to expand swiftly. This is negatively impacting habitat for prairie grouse and other wildlife. We ask GFP to work with other state and federal agencies, ag, and conservation groups on methods to curtail woody encroachment and to restore the impacted grassland habitat. This can be accomplished through prescribed burns and tree removal projects.

Grassland Management/Grazing

We encourage GFP to continue working with organizations such as the South Dakota Grassland Coalition to promote sustainable and profitable grasslands. This effort should include grazing management practices that avoid overgrazing and promote rotational grazing. This will help keep grasslands healthy for the producer, prairie grouse, and other wildlife. Producers should also be encouraged to utilize “wildlife friendly” fencing to minimize negative impacts on prairie grouse and other wildlife.

Conservation Reserve Program (CRP)

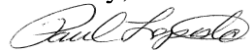
CRP has helped increase prairie grouse populations in the state. CRP increased and expanded prairie chicken populations in parts of their range. Sharp-tailed grouse increased and expanded their range. The Division asks that the plan reflect the needs of prairie grouse when CRP acres are seeded. We urge GFP to encourage landowners to offer acres during CRP signups.

Outreach

As part of the Action Plan, we support continued communications from GFP that inform people about prairie grouse, their habitat needs, population trends, and hunting and viewing opportunities. We also ask GFP to share the new information from research conducted on prairie grouse and their habitats across the state.

The South Dakota Division of the Izaak Walton League of America thanks you for the opportunity to comment on the Prairie Grouse Action Plan, 2023-2027, and we ask to be kept informed on all future developments on this topic.

Sincerely,



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