

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

Decision Record
Finding of No Significant Impact
Environmental Assessment
DOI-BLM-NM-0060-2016-4-EA
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Prairie Dog Population Control at Satanta Maintenance Facility in Satanta, Kansas

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BUREAU OF LAND MANAGEMENT
AMARILLO FIELD OFFICE**

Project: Satanta Maintenance Facility Prairie Dog Control

EA Log Number: DOI-BLM-NM-0060-2016-4-EA

Location: Satanta Maintenance Facility in Haskell County Kansas

Finding of No Significant Impact

Based on the analysis of the potential environmental impacts of the proposed action in the attached Environmental Assessment, I have determined that the proposed alternative to trap and relocate prairie dogs to a viable habitat away from the 10-acre Satanta Maintenance Facility is not expected to have significant impacts on the environment. While trapping is effective in capturing a majority (i.e., 80% to 85%) of the prairie dogs, those that are resistant to trapping will be managed using federal and state-approved pest-control procedures. Preparation of an Environmental Impact Statement is not required.

We have looked for endangered and/or listed species at the site of the proposed action and did not find any. We consulted with local, state and federal wildlife experts to determine if they are aware of the existence or possibility of existence of endangered and/or listed species at this site or in the area and were assured that they are not aware of any. We looked at the impacts to the overall population of prairie dogs in Kansas and, based on the limited number in comparison to the total population and the small area of the 10-acre Satanta Maintenance Facility, we could find minimal effects. Based upon careful analysis of the situation, the need to protect the pipeline operations, and the small population of prairie dogs relatively isolated by farmlands containing little to no prairie dogs, the development of an Environmental Impact Statement is not necessary.

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1.0 INTRODUCTION

This Environmental Assessment (EA) has been prepared to analyze the potential for environmental impacts and to develop a decision process related to prairie dog population control on 10-acres of the federally owned property at the Satanta Maintenance Facility, located in Satanta, Kansas. This assessment includes discussion of the techniques currently used to control prairie dog populations in agricultural areas. Alternatives considered in this EA include the following:

- Continue doing nothing,
- Humanely capture and relocate the site's prairie dogs to a suitable habitat, or
- Eradicate using standard techniques recommended and approved by the Kansas Department of Wildlife, Parks and Tourism.

The assessment analyzes potential environmental impacts that could result with the implementation of any of the alternatives considered. The *proposed actions* are analyzed, as well as the expected situation if *no action* is taken to control the prairie dog population at the Satanta Maintenance Facility. This EA provides analysis and documentation that complies with the National Environmental Policy Act (NEPA). In addition, the EA provides evidence for determining whether the BLM will make a "Finding of No Significant Impact" (FONSI).

A FONSI is a document that briefly presents the reasons why implementation of the preferred action alternative would not result in significant environmental impacts beyond those already addressed in the Texas Resource Management Plan (Texas RMP) (BLM 1996)(see References 8, 9). As defined by the Council on Environmental Quality (CEQ), the significance of a Federal action is determined by the context of the action in relation to the overall project setting, as well as the intensity of direct, indirect and cumulative effects resulting from the project. If the BLM determines that the preferred action alternative would not result in significant impacts, a Decision Record (DR) and FONSI would be prepared approving the selected alternative. If the project is found to result in significant impacts, an Environmental Impact Statement (EIS) would be prepared.

The Bureau of Land Management is an agent for society which accounts for direct benefits to the general public and the environment and the costs associated with any project.

1.1 Background

The U. S. Department of the Interior, Bureau of Land Management (BLM) Amarillo Field Office (AmFO) operates and maintains the Satanta Maintenance Facility located near Satanta, Kansas for the purpose of production and transportation of the BLM's crude helium. The facility includes an administrative building, a maintenance building, and a fenced lot. A dense population of black-tailed prairie dogs has recently established itself in the ten acre facility, due to pressure from the adjacent agricultural land. The prairie dogs are considered a nuisance species to the surrounding agricultural community, and pose infrastructure (above and below ground) and health risks at the Satanta Maintenance Facility.

1.2 Location

The Satanta Maintenance Facility was constructed in the early 1960s, based on information provided in the NEPA EA prepared and approved via ROD and FONSI on December 28, 1999 (EA Number 090-001-00, Amarillo Field Office). The station is located at 37° 26' 53.66" N 100° 57' 45.07" W in Haskell County, Kansas. Please see *Attachment 1* showing a map and recent satellite view of the facility and surrounding area.

1.3 Purpose and Need

Proposal Purpose

This EA has been prepared to explain the documented analysis that supports the BLM's proposed action and to comply with the requirements of NEPA and the BLM National Environmental Policy Handbook (H-1790-1). NEPA requires the BLM to analyze potential environmental impacts on proposed prairie dog population control options at the BLM-operated Satanta Maintenance Facility to determine if an Environmental Impact Statement is required. As part of the review of alternatives, State and Federal agencies possessing special expertise and/or jurisdiction in the management of particular resources or species have been consulted to provide the advice regarding potential impacts.

Need for Proposal

The AmFO is proposing to control the prairie dog population at the Satanta Maintenance Facility because the number of prairie dogs has grown significantly over the past two years and they are burrowing very close to the pipeline and the maintenance facility. The situation is exacerbated because their habitat has been controlled and reduced in surrounding farm and ranchlands by population eradication using techniques such as poison baits and recreational shooting. The prairie dogs are considered a "nuisance" and a "pest" by most farmers and ranchers because of the disruption that their colonies and burrows cause to farm equipment and operations. *Attachment 1* shows the helium maintenance facility on BLM-owned property with an active prairie dog town located adjacent to the facility.

The prairie dogs at the Satanta Maintenance Facility number approximately 250 individuals and 350 burrowing holes, based on a recent survey in early August 2015. This survey will be discussed further in Section 3.0, *Affected Environment*. The increasing numbers in the limited space of approximately 10 acres has resulted in the prairie dogs burrowing near the maintenance facility and the pipeline and possibly chewing on various cables for communication and electricity. For example, internet communication is often disrupted and service checks to investigate the causes indicate that the physical line may be compromised by prairie dog activity.

The proposed action is needed for the continued safe operation of the Satanta Maintenance Facility to provide Helium at a steady rate so that the requirements of the *1996 Helium Privatization Act* followed by the *2013 Helium Stewardship Act* are met, ensure contractual obligations are fulfilled, and global helium needs are provided for.

1.4 Land Use Plan Conformance

The proposed action is subject to and has been reviewed for conformance with (43 CFR 1610.5, BLM 1617.3) the Texas Resource Management Plan (RMP) (May 1996), as amended. The Texas RMP and Record of Decision describe management decisions based on resource and surface management ownership areas. At the time of preparation and development of the RMP the Amarillo Helium Operations Office was a part of the Department of Interior, Bureau of Mines (BM). At the dissolution of the BM, the Amarillo Helium Operations Office was transferred to the BLM. Transfer of the Helium Operations Office in Amarillo from the jurisdiction of the BM to the BLM resulted in the need to amend the Texas RMP. The Texas RMP was amended in 2000 to include the AMFO.

The proposed actions are in conformance with the applicable RMP, even though it does not specifically address the Cliffside Gas Field or the helium pipeline. The proposed action is consistent with the goals and objectives of the plan, as well as those for the BLM's helium resources program.

1.5 Identification of Issues

Internal scoping was conducted by reviewing the proposed project and location to identify potentially affected resources and land uses. The BLM Interdisciplinary Team (IDT) identified resources and land uses present and affected by the proposed project and focused the analysis on those issues. The following questions were raised as issues to consider further:

- What effect *will* the proposed action have on the habitat for the prairie dog population?
- What effect *will* the proposed action have on other species that rely on the habitat created by the prairie dogs?
- What effect *will* the proposed action have on known and newly discovered artifacts or areas of cultural, paleontological, and archeological significance? A previous EA from 1999 covered this potential issue
- What effect *will* the proposed action have on federally listed and state-listed species that have the potential to be located in the proposed project area? These species may include black footed ferrets and other species known to be associated with prairie dog colonies.
- What effect *will* the proposed action have on Migratory Bird species? Burrowing owls are seasonal residents of prairie dog habitat.
- What effect *will* the proposed action have on wildlife and their habitat in general?

Several issues were considered during project scoping but dismissed from detailed analysis because there would be no potentially significant effects related to the issues resulting from any of the alternatives presented below. The following elements are determined by the IDT, following onsite visits, review of the Texas RMP (1996), as amended and other data sources, to not be present:

- Environmental Justice
- Areas of Environmental Concern
- Wild Horse and Burros
- Recreation
- Wild and Scenic Rivers
- Wilderness
- Cave and Karst
- Hazardous Wastes

- Mineral Resources
- Climate Change
- Watershed
- Water Quality and Quantity
- Non-native species
- Wetland/Riparian Areas
- Socioeconomics
- Floodplains
- Visual Resources
- Livestock grazing

2.0 PROPOSED ALTERNATIVES

This EA analyzes the impacts of *No Action*, *Alternatives* and the *Proposed Action* relating to prairie dog population control and prevention of continuing helium maintenance facility and pipeline damage proposal.

2.1 No Action Alternative

CEQ regulations require the consideration of *No Action* (40 CFR 1502.14). The BLM NEPA Handbook (H-1790-1) states that for EAs on externally initiated proposed actions, a no action alternative generally means that the action would not take place. Under this alternative, the BLM would not authorize prairie dog population control for the Satanta Maintenance Facility. The proposed population control would not be conducted. Damage to helium maintenance facilities would continue and present potential threats to the operation of the pipeline as well as harm to employees, the public and the environment in the event of an accident or uncontrolled release from the pipeline.

The surrounding land owners have expressed concern and frustration about BLM's lack of prairie dog control. Therefore, the no action alternative would allow the continuation of prairie dog population dispersal into private lands surrounding the helium facility where persistent prairie dog control is applied.

2.2 Proposed Alternatives

Three options are considered for this EA that are based on methods typically utilized to control prairie dog communities, as follows:

- 1) Lethal removal,
- 2) Isolating populations from migration through the construction of barriers, and
- 3) Trapping and relocating through approved and proven scientific methods.

A discussion of these proposed alternatives is provided below.

1. *Lethal Removal Methods*

Prairie dog management programs and control laws exist and the BLM has sought out consultation and guidance from Kansas State University wildlife specialists and prairie dog management consultants. They provided options for prairie dog population management in a verbal discussion with BLM Environmental Coordinator, Cindy Sundblad on April 13, 2015.

The following list of prairie dog population controls and discussion is derived from discussion with Kansas State University advisor and consultation documents (3, 4):

- Shooting
- Pesticide application using poison baits and burrow fumigants
- Predator attractants
- Visual Barriers

Note that the use of vacuum devices for extracting and collecting or gas exploding equipment for destroying burrows is not legal in Kansas (3, 4). Therefore, vacuuming and gas exploding equipment will not be analyzed in this assessment.

Shooting

Intensive rifle shooting during the breeding season (February) is used to disrupt prairie dog reproductive activities and prevent colony spreading. According to a KSU 2006 bulletin, it is not likely that shooting will ever be considered successful eradication as a population management technique. Shooting is not an option on this property since no weapons are allowed at the Federally-owned facility and their use would pose dangerous situations for the gas pipeline infrastructure and the employees working at the facility. Further, implementing shooting as an alternative would increase the possibility of lead poisoning in non-target species that currently utilize the property as either resident or transient individuals (16).

Poison Bait and Burrow Fumigants

Pesticide-based toxicants that can legally be used in Kansas include poison grain or pellet baits and fumigants. The general dispersal of toxicants on prairie dog colonies can have devastating consequences on non-target species. Great caution must be used in the application of either of these eradication methods because of the non-selective nature that does not target a particular species. The poison baits may affect a variety of birds and mammals that inadvertently consume the bait. Fumigants kill all wildlife found in the burrows. In addition, baiting is only effective during calm weather because the poison can be washed away with precipitation.

Applying any pesticide to the general area of the prairie dog colony as a broadcast treatment is not desired; however, establishing a means for identifying the remaining non captured prairie dogs and their burrows and fumigating them at that point will most likely help achieve a 100% removal of the population with a minimal chance of affecting non target species. This will be discussed further in the preferred action alternative.

Predator Attractants

The black-footed ferret is an endangered species that feeds on prairie dogs. It is illegal to kill them. They are seldom observed because they have low population densities and are primarily active at night. Introduction of the black-footed ferret into the area would require permission and assistance by the U.S. Fish and Wildlife Agency because of their designation as an endangered species. In May 2015, federal wildlife managers released 20 captive-bred black-

footed ferrets into the 27-square-mile Rocky Mountain Refuge near Denver, Colorado to help control the prairie dogs that are threatening newly restored native prairie. In comparison, the Satanta Maintenance Facility is limited to 10 acres surrounded by active farmland and does not make this a viable alternative. If black-footed ferrets were introduced to the area, they would run out of prairie dogs as food sustenance likely within the first year, since a ferret needs approximately 100 to 150 prairie dogs per year to survive (10, 11, and 12). State wildlife experts do not believe black-footed ferrets would be found in this area of Kansas farmland (3, 4).

2. Isolating Prairie Dog Populations Using Barriers

Prairie dogs are social animals that depend upon visually unobstructed environments. Unobstructed environments allow constant contact amongst coterie (family units). An unobstructed environment allows coterie to identify threats ranging from territorial trespassers from other coterie and potential ground and aerial predators (15).

The construction of burlap sack fences, the planting of large trees, and the installation of rock features, and various other methods have been implemented and evaluated through past research. While these features helped retard population expansion, they did not eliminate it. In their study, Franklin and Garrett (1989) stated that burlap sacks were not an adequate barrier control for prairie dogs on small colonies as they crawled under and chewed through the sacks. In fact, their study showed greater prairie dog grazing in their experimental plot versus their control plot. Growing trees and installing rock features does not address or solve the issues of prairie dog expansion via burrowing below ground through the above ground obstruction.

Constructing barriers to reduce population expansion does not alleviate the issues associated with the helium pipeline infrastructure nor the constant contact with BLM personnel. Keeping the population onsite is not an option as buried pipelines, cables, and electrical lines will continue to be impacted by chewing. The population at this 10 acre facility is dense enough that the prairie dogs are burrowing within inches of the office building, the storage sheds and vehicle bays. Therefore, removing the prairie dogs is the only viable option.

3. Trapping and relocating through approved and proven scientific methods

An alternative proposed by the Kansas Chapter of the Sierra Club is to trap using bait and relocate the prairie dogs, possibly to the Cross Bar Ranch, operated by the BLM in Texas, or the Cimarron National Grasslands in Kansas in order to increase genetic diversity in restoration efforts. We contacted the Cimarron National Grassland, but they state that they currently have a sylvatic plague problem, and they allow and encourage shooting of prairie dogs. Therefore, we would be spending public dollars both to save the prairie dogs by trapping and relocating them to this National Grasslands, if they will accept them, only to have them exposed to the current plague and potential shooting.

We contacted the Kansas Department of Wildlife, Parks, and Tourism (KDWP) with respect to Prairie Dog State Park about possible acceptance of the Satanta prairie dogs. The Park Manager stated that they probably would not accept them because they have a small population of 150 to 200 prairie dogs

and boundary issues with the current population. KDWPT likely would not allow a doubling of the population as well as the risk of introducing disease. He knows of no other place in Kansas that would receive the prairie dogs.

Relocation of the prairie dogs to the BLM-operated Cross Bar in Texas is not a viable alternative because soil depth surveys indicate only about 80 acres of land are viable for prairie dog burrowing habitat. In addition this land is located near the Canadian River and receives all-terrain vehicle activity. The prairie dogs would likely be harassed from the off-road activity, including shooting. Thus this habitat is not considered a viable alternative. In addition, it is not likely that the transfer of the animals across state lines would be legally viable.

Our communication and collaboration with the Prairie Dog Coalition of The Humane Society of the United States (PDC) has resulted in locating a private ranch in Barber County, Kansas that is willing to accept the prairie dogs. We are developing a viable process and agreement that will allow us to accommodate this opportunity, so that this will be a preferred alternative.

2.3 Proposed Action

The *proposed action* is to control the prairie dog population at the Satanta Maintenance Facility by trapping, acclimating and releasing individual prairie dogs to a new and approved site in Kansas, by implementing appropriate and acceptable methods driven by scientific research. A complete 100% removal of individuals utilizing the trapping method may not be possible; therefore the application of fumigants to specifically identified burrows will be implemented following trapping to eliminate the remaining individuals.

Trap and Relocation Method Followed by Fumigation of Identified Burrows

The reason for selection of the capture and relocation along with fumigation alternative as opposed to repetitive capture or general lethal eradication and other prairie dog control measures is to ensure that the best effort conservation of the species coincides with the BLM's adaptive land management policy. For reference regarding the status of the black-tailed prairie dog species, note that the Sierra Club has a "*Wild America Campaign*" focused on maintaining and working towards whole and healthy natural systems in our forest and grasslands. They have stated that Kansas, historically had 2 million to 7.5 million acres of black-tailed prairie dogs and the most recent survey by USFWS in 2008 found 148,000 acres. The species has been petitioned four times for Endangered Species Act listing. The BLM recognizes the need to consider alternatives to our proposed actions that promote optimum land use and management techniques.

The Amarillo Field Office will coordinate with its neighbors in Kansas, non-profit organizations, and state and federal government agencies to remove the prairie dogs at the Satanta substation.

A Scientific Collection Permit from the KDWPT must be secured by the entity trapping the prairie dogs. The KDWPT will assist BLM in obtaining the required permit. The BLM along with assisting agencies will seek and identify an approved facility that will accept the trapped prairie dogs.

A State of Kansas approved fumigant will be selected to euthanize of any remaining prairie dogs that could not be trapped. The trapping process is multi-faceted and takes several weeks to implement and complete. Below is a general and standard process used in trapping and relocating prairie dogs, which is subject to change as appropriate to the situation in the field:

- 1) Obtaining a permit from the State of Kansas
- 2) Site assessment
 - a. The agency selected to carry out the trapping and removal process will visit the site prior, during, and after trapping methods are implemented
- 3) Capturing
 - a. Pre-bait the trap site
 - b. Dust the site with Delta-dust to reduce flea infestation
 - c. Activate the trap site
- 4) Quarantine
 - a. Captured prairie dogs must be quarantined to monitor for sylvatic plague
- 5) Fumigation of non-captured prairie dogs
 - a. Burrows observed during the trapping period with remaining prairie dogs will be fumigated by a licensed pesticide applicator
- 6) Transport
 - a. After quarantine period, trapped prairie dogs will be handled and transported by adhering to specific guidelines established through years of research
- 7) Release Site Preparation
 - a. Determine eligible pre-existing burrows
 - b. Install artificial nest boxes
- 8) Prairie Dog Release
 - a. Spray each individual prairie dog with insecticide and place them in their artificial burrow (with coterie members)
- 9) Acclimation Period
 - a. 3 – 5 day period in which the prairie dogs can only move within their artificial burrow
- 10) Monitoring
 - a. Prairie dogs will be monitored by the accepting ranch personnel for 2 weeks after full release to new site
- 11) Documentation and Reporting
 - a. Data collection records will be kept and final reports will be provided to each partner

3.0 AFFECTED ENVIRONMENT

This section describes the environment that is affected by implementation of the proposed action described in Section 2. Aspects of the affected environment described in this section focus on the relevant resources and issues that need consideration in relation to the proposed action. Certain critical environmental components require analysis under BLM policy. Only those elements of the affected

environment that have potential to be impacted are described in detail. In this case, the context of the proposed action for prairie dog management is in relation to the approximately 10 acre helium maintenance facility. *Attachment 2* provides a satellite photo of the Satanta Maintenance Facility and evidence of expansion of the prairie dog town on BLM lands to private lands to the west. These neighbors have expressed concern that the prairie dog town will continue to migrate and impact their lands if we do not control the population on the BLM lands. Analysis of the intensity of the proposed action may be construed in relation to the broad base of surrounding farmland that can be seen in *Attachment 3* where prairie dog habitat is controlled by the private land owners. Consequently, the BLM facility acts as a protected area for prairie dogs that have survived eradication from the surrounding farmland.

3.1 Status of Prairie Dog Species

Truett, et al in 2001 (14) indicate the following summary for the status of prairie dog species in North America: All 5 species of prairie dog have disappeared over large portions of their former ranges. The Mexican prairie dog was listed as endangered in 1993. The Utah prairie dog was listed as threatened in 1992 and The National Wildlife Federation petitioned for listing of the black-tailed prairie dog as threatened in 1998. Currently in 2016, the black-tailed prairie dog is not listed as a threatened species, however conservation of prairie dogs has a high priority among grasslands management issues.

Prairie Dog Species Background

Prairie dogs are considered a “keystone species” that provide a habitat that attracts many other species, including black-footed ferrets, badgers, coyotes, foxes, prairie falcons, ferruginous hawks and eagles. These species are predators and the prairie dogs are an important part of their natural diet. Prairie dogs provide valuable habitat for the burrowing owl, a seasonal migrating bird. Prairie dogs are ecological engineers that create burrowing systems and maintain short grass and forb coverage on the surface and throughout their towns and colonies. Burrowing owls use abandoned or seldom-used burrows for nesting and they require the short vegetation maintained by the prairie dogs to allow them better observation for potential predators.

According to Duvall, et al, black-tailed prairie dogs are colonial, burrowing, herbivorous rodents. Colonies are divided into coterries made up of related females, their young, and an unrelated adult male. Prairie dogs live to be about 4-5 years old and are productively mature at 2 years of age. An average of 4-5 pups are born in May. Dispersal occurs from mid-May to mid-July, with an average distance of 2.4 km (1.5 miles) and a maximum distance of 10 km (6 miles).

Prairie dog colonies once covered 40,000,000 ha (154,000 sq. mi.) with current estimates indicating 1-2% of historic level. Primary causes of the decline and isolation of colonies were eradication programs based on poisoning and shooting, conversion of grassland to cropland and sylvatic plague.

Assal and Sovell (1) provide compelling summarization of the plight of the black tailed prairie dog in their 2004 report for the BLM that is based on their research over four counties in northeastern Colorado. The black-tailed prairie dog historically has been found from southern Texas to North Dakota,

Wyoming and Montana near the Canadian border with the United States. Significant population impacts have contracted their habitat and occurrence during the past century that are attributed to three things: 1) Range was converted to farmland; 2) large scale poisoning, and 3) sylvatic plague capable of killing 99% of colonies population has severely impacted the species. According to their research, approximately 20 percent of the original range no longer contains prairie dogs, and that was 10 years ago.

Black-Tailed Prairie Dog Population Considerations in Kansas

The current condition of black-tailed prairie dog habitat in western Kansas, Hastert County near Satanta is rural, farm and pastures, and mostly devoid of prairie dogs, most likely because the landowners have used eradication techniques to clear their lands of the rodents. Several articles are available to provide a summary of the overall status of prairie dog populations across their historically known habitat boundaries in the western United States. A useful reference for regional consideration of the total population and a targeted view of the small population found at the Satanta Maintenance Facility is Mulhern and Knowles paper, "Black-Tailed Prairie Dog Status and Future Conservation Planning" (7). The authors reference Miller, et al 1994 estimation that "all species of prairie dogs may have declined by as much as 98% during the first half of this century", referring to 1900 to 1950 as the population or humans spread and settled more of the western U.S. Threats to prairie dogs include loss of prairie, eradication or control efforts, prairie dog shooting, and sylvatic plague.

In Kansas, there are a few areas left where prairie dogs have not been eradicated for farming or livestock purposes. Mulhern and Knowles (7) reported in 1999 that the National Park Service estimated approximately 16 hectares (39.5 acres) of prairie dogs at the Fort Larned National Historic Site and on the Cimarron National Grassland southwest of the Satanta Maintenance Facility; the Forest Service estimated 440 hectares (1,087 acres) of active prairie dog colonies.

Privately-owned properties in Kansas are an additional possibility for the trap and relocate alternative. Other state or federally-operated lands, such as the Cimarron Grasslands may be able to accept the prairie dogs if there is space for them and there are no extenuating circumstances such as disease that may affect the prairie dogs either at the new facility or that could be transferred from the helium property prairie dogs.

In reference to eradication or control efforts, Mulhern and Knowles (7) observe that "most poisoning on federal land is due to private land concerns, not necessarily federal forage concerns." That is a relative concern for the Satanta Maintenance Facility because the surrounding landowners do not want the prairie dogs migrating to their private properties.

Witmer and Fagerstone (13) conclude that when conflicts arise with the existing prairie dog colonies, there are two options: capture and relocation or lethal removal.

In reality, an integrated approach to management of rodent populations and damage is most likely to result in a successful outcome.

Historical NEPA reference for the Satanta Maintenance Facility is provided in an EA that was prepared in 1999 to address the *proposed action*, purpose and need for the construction of the Satanta maintenance facility. That EA provides background on the affected environment and consultation with experts. The Kansas State Historic Preservation Office reviewed the project and determined that it did not impact any property listed on the National Register of Historic Places. In addition, U.S Fish and Wildlife Service was consulted in 1999 for the referenced EA and determined that the proposed building of the maintenance facility “would not likely affect any wetland, riparian zones, Federal or state threatened or endangered plant or animal species, designated critical habitat, species proposed for listing, species under review by the U.S. Fish and Wildlife Service or any other special status species. The consultations documented in this EA are found in the References section.

Recent Observations at the Satanta Maintenance Facility

BLM Amarillo Field Office’s Natural Resource Specialist and Environmental Coordinator performed a recent survey of the area on August 4 and 5, 2015 around and within the Satanta Maintenance Facility. The survey indicates a growing population of prairie dogs based on the number of young juveniles observed and the new burrows. The area has had plentiful rainfall this year that has provided plenty of forage and consequently the prairie dog population has surged. Our survey estimated approximately 250 prairie dogs and approximately 400 burrows. In addition, we found that approximately 16 burrowing owls use the prairie dog habitat. A badger has been seen by staff at the facility, although we did not see it during our surveys. A night spotlight survey did not indicate other predators of the prairie dogs, such as ferrets.

It is without a doubt that the prairie dog town at the Satanta Maintenance Facility provides valuable habitat for both transient and resident species. It is anticipated that as prairie dog removal commences species diversity and density will lessen. AmFO has taken this into consideration and has weighed all the options. Knowing the effects of prairie dog reductions nationwide has led us to the proposed action of helping restore the species at a different location.

3.2 Wildlife

3.2.1 Threatened and Endangered Species

Approximately 1300 endangered or threatened species occur in the United States today. Endangered species are plants and animals that have become so rare that they are in danger of becoming extinct or are considered extinct in the wild. Threatened species are plants and animals that are likely to become endangered within the foreseeable future throughout its range (Endangered Species Protection Program/EPA.gov). The Endangered Species Act of 1973 is designed to protect critically imperiled species from the consequences of anthropogenic activities. The Act is administered by the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration.

Per the following stipulation that will be included in the current update to the RMP the following statement will be applied to the BLM’s helium maintenance facility in Kansas:

Black-Footed Ferrets in Kansas/Consultation Stipulation

“If black-footed ferrets occur anywhere in Kansas, they are presumed to be associated with prairie dogs. All or portions of this lease area lie within a county of Kansas where prairie dog towns have occurred in the past. Therefore, if a prairie dog town of eighty acres or more is found to occur on or near this lease, a black-footed ferret survey may be required before permitting surface disturbing activity which may impact the prairie dog town.”(CSU) Based on the eighty acre criteria for assumption of the potential to find endangered black-footed ferrets, it is not logical that any of the species would be found on the 10 acre prairie dog town that is surrounded by active farmland that show little to no signs of burrowing or prairie dog activity. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. § 1531 et seq., including completion of any required procedure for conference or consultation.

3.2.2 Special Status Species

The group of species referred to here, and in the attached biological evaluation, as special status species (SSS) includes federal and state listed threatened or endangered plant or animal species, species proposed for listing and species under review by the U. S. Fish and Wildlife Service (FWS), Kansas Department of Wildlife & Parks (KDWP). The authority for this policy and guidance regarding the evaluation of SSS comes from the Endangered Species Act of 1973, as amended; the Federal Land Policy and Management Act (FLPMA) of 1976; and Department of Interior, Bureau of Land Management, Special Status Species Management (Manual 6840). There are no Wilderness Study Areas (WSA’s) or Special Management Areas (SMA’s) within the proposed area (Table 4).

3.2.3 Migratory Birds

The central flyway is a bird migration route that begins in the north in Canada and generally meanders along the Great Plains and goes through the Gulf of Mexico. Migrating birds use this flyway between breeding and wintering seasons and often use the region as a stop-resting and foraging ground. Common migratory bird species that occur near the proposed project area are too numerous to list in this document, however, migrating birds observed at the specific site are protected under the Migratory Bird Treaty Act of 1918. The Migratory Bird Treaty Act makes it unlawful, without a waiver, to pursue, hunt, take, capture, kill, or sell birds that are considered migratory. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests. There are currently over 800 species on this list, several species of which have been observed in the proposed project area. Burrowing owls are present in the prairie dog habitat. Approximately 16 were counted in our August 4, 5, 2015 survey.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Effects from No Action

There would be no control of prairie dog population or habitat and the prairie dog population would likely ebb and flow naturally. Increases in population will likely continue to spill over into neighboring private farmlands. Population control of prairie dogs would likely result in continued intense population at the Satanta Maintenance Facility with associated stresses on helium facility assets. Further, isolation could have the tendency to increase disease transmittal among the prairie dog coterries.

An isolated population of prairie dogs that could be used as a genetic refuge is not likely to succeed as a protocol for future restoration of the species because isolation tends to result in a species being more prone to transmittal and dispersal of disease upon exposure. There is no evidence that the Satanta population has been previously exposed to the plague resulting in 'genetic hardening' to the disease; however, their close proximity to BLM personnel onsite poses concerns for disease transmittal to those people.

4.2 Effects of Proposed Alternative to Capture and Relocate Prairie Dogs

The authors Truett, et al, (14) provide some general handling and care advice for implementation of this option. They recommend capturing the prairie dogs in wire-mesh traps and holding the animals for quarantine and transporting them in cages large enough to allow for postural adjustment. Segregation of overtly aggressive adults, usually males, should be done as the need becomes apparent. In addition the Prairie Dog Coalition of The Humane Society of the United States has performed wild-to-wild prairie dog relocations and non-lethal management techniques in five states for over 13 years and has relocated or helped relocate over 7,750 prairie dogs. They have valuable experience and expertise and BLM is consulting with their Innovative Wildlife Management & Services Program to assist us in understanding the process of humanely capturing, quarantining, caring for, observing, transporting, preparing a release site, acclimating the animals to their new habitat, releasing and post-release monitoring.

4.2.1 Mitigation Activities Proposed as a Supplement to Capture and Relocation

Lethal Removal Option

Attitudes in most of Kansas where people make their living from the land with farming or ranching are that the prairie dogs are pests and they do not like them. So they tend to poison or use a toxicant to eradicate them from their land.

Fumigants are the most commonly used and requires at least two people to apply and a vehicle with a placard identifying the toxicant is in transport. The Kansas State University agriculture extension office confirmed that there are approximately 200,000 acres of prairie dog habitat remaining in Kansas. They provided the BLM with a copy of a KSU publication titled "*Prairie Dog Management and Calendar of*

Action” to assist us in determining how to control the prairie dog population using methods accepted and legal in Kansas.

The state of Kansas has extension offices (5) that can assist BLM in recommending which fumigant is the preferred. Our natural resource specialist, Adrian Escobar has spoken with the local extension office located in nearby Sublette. They recommend applying Rozol poison bait and monitoring the area over a two week period following treatment. The BLM, however, does not intend to use a granular pesticide application as it does pose risks to non-target species for a longer period of time versus fumigation.

4.3 Wildlife

The composition and population levels of the species of wildlife that are or could be using this 10 acre habitat would go through seasonal and year-to-year fluctuations directly related to vegetation condition factors at the site. These adjustments would be exhibited by the wildlife populations present. A badger has been observed near the facility during the summer of 2015. However, the badger appears to have migrated away because it has not been spotted over the fall or winter of 2015 and 2016.

Mitigation Common to All Species

Excessive application of any of the prairie dog control measures will be avoided at all times. Monitoring for any ground-nesting species that can potentially occur in the proposed area will be conducted before any disturbance commences. Burrowing owls and rattlesnakes that use the burrows will likely leave the area after the prairie dogs have been extirpated.

4.3.1 Mitigation Post-Capture and Release Monitoring and Management

Truett, et al (14) provides advice for post-release monitoring and management. The authors recommend monitoring frequently immediately after release, typically from an elevated position. This can include monitoring individuals with radio tracking, daily counts of animals observed above ground and seasonal census. Monitoring frequency should decline sharply with time after release. Monitoring should include reconnaissance for signs of predation or predators.

Because there is extreme risk to the translocated prairie dogs by badger predation if the new site does not have pre-existing and extensive burrows, the relocation site will be prepared as appropriate to accommodate the new prairie dogs. Supplemental food will be provided at release sites to help reduce dispersal and predation. Released animals have been found to excavate new burrows near food in preference to sites farther away.

Follow-up actions will include monitoring of the Satanta facility habitat area after removal of the current population to prevent recolonization of the area. Prairie dog population control will be applied to prevent a reoccurrence of the current situation that has resulted in conflicts with helium activities, complaints from neighbors and an uncontrolled population of prairie dogs converging on a small area relative to the surrounding area. The standard technique to reduce population that has been used for 40 years, as discussed in *Prairie Dog Management and Calendar of Action* published by Kansas State University (4), is application of ZP rodent bait in October or early November. However, the BLM believes

application of toxic fumigants to individual burrows of remaining prairie dogs will limit exposure to other species that may be exposed by wandering into the area.

4.3.2 Threatened and Endangered Species

No known threatened or endangered species occur in the counties near the Satanta, Kansas facility. A wildlife survey of the sight was conducted on August 3 and 4, 2015 by Cindy Sundblad, BLM Environmental Coordinator at the Amarillo Field Office and Adrian Escobar, the BLM Natural Resources Specialist for the Cross Bar property adjacent to the Amarillo Cliffside Gas field, operated by BLM. We found no evidence of black-footed ferrets in a brief, but intensive night spotlight survey looking for signs of the endangered species. The black-footed ferret's primary source of food is the prairie dog, so the survey was conducted to ensure that there is no evidence that they have found a way into the small 10 acre habitat.

State and federal agencies were consulted as part of the BLM's 1996 RMP for information regarding county specifically listed threatened or endangered species. It would be the policy of the BLM to follow federal and state guidelines set forth regarding species disturbance for planned spraying throughout the where the species occur at that point in time. More specifically, the state and federal agencies were again consulted in 1999 as part of our NEPA considerations prior to construction of the Satanta facility. The EA documenting the proposed construction references review of the area by U.S. Fish and Wildlife and the Kansas Department of Wildlife and Parks. Their review determined that the proposed action "was not likely to affect any wetland, riparian zone, Federal or state threatened or endangered plant or animal species."

Mitigation

Before and during prairie dog control activities the area will be monitored for the presence of federally and state listed special status species. Surface disturbance will be limited to the least area possible.

4.3.3 Migratory Birds

Migratory birds occur throughout the area as the location of the Satanta, Kansas facility is located in the central flyway. The list of migratory birds is too numerous to list in this document; however, birds common to the area have been observed and documented through state and federal wildlife departments. Our primary concern is protection of the burrowing owls that have been observed and surveyed on the property. These burrowing owls will not be affected by the proposed action because no eradication of prairie dogs will take place until the owls have migrated from the area. We anticipate the burrowing owls will migrate away from the area in October and do not expect them to return to the area until spring 2016. It is important to understand and accept that toxic fumigation of the prairie dogs in order to eradicate them will also drive out the burrowing owls that have been observed using the prairie dog habitat. Several studies indicate that burrowing owls will only use poisoned prairie dog towns for a few years after eradications since the engineering and maintenance of the burrowing system, surface mounds and short grasses no longer exists (see photos below.)

Photos of burrowing owls and prairie dogs at Satanta Maintenance Facility, August 3 & 4, 2015



Mitigation

The proposed site will be monitored for migratory bird movement, with a focus on the burrowing owls that have been observed and surveyed. The nature of the trapping method minimizes inadvertent interactions with burrowing owls during the process.

Encounters of other migratory bird nests on the proposed project area are not expected, however, if a nest is encountered an evaluation for disturbance and avoidance will be conducted.

4.4 CUMULATIVE EFFECTS

There may be short-term impacts to resident wildlife such as the badger known to occupy some of the burrows or other species that may traverse the property during the prairie dog capture and removal process. The area is surrounded by active farm land and does not provide good wildlife habitat due to the frequent disturbances related to farming activities. Witmer and Fagerstone 2003 (13) article

concludes that after reviewing the various practices “in reality, an integrated approach to the management of rodent populations and damage is most likely to result in a successful outcome.”

BLM will report results of the selected alternative and make public to interested parties.

4.5 MONITORING

Implementing the proposed action would have no cumulative impacts on any resource. Close monitoring of the site is planned for at least a two-week period after implementation of any prairie dog control activities. Monitoring and documentation will improve BLM’s understanding of the actions and results and will lead to better management.

5.0 CONSULTATION/COORDINATION

This section includes the resource specialists located within the AmFO and the OFO that specifically participated and provided input in review of the proposed project and development of this EA document.

Adrian Escobar, Natural Resource Specialist, Amarillo Field Office, conducted field survey on August 4 and 5, 2015 for population estimate of black-tailed prairie dogs and burrowing owls, and observations for other species, including black-footed ferrets or other predators at the Satanta, Kansas helium maintenance site.

Charles Lee, verbal consultation with Cindy Sundblad, on April 13, 2015 regarding black-tailed prairie dogs and impacts to Satanta, Kansas helium pipeline operations.

George Thomas, Wildlife Biologist, BLM Tulsa Office.

Prairie Dog Coalition, The Humane Society of the U.S., Boulder, CO.

Ryan Howell, Archeologist, BLM Tulsa Office.

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Attachment 1

Map of Satanta Maintenance Facility near Satanta, Kansas



Aerial View of Satanta Maintenance Facility

