# APPENDIX W

# PUBLIC COMMENTS AND RESPONSES TO DRAFT SD RMP/EIS

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**Table W-1**
**Comments Related to ACECs and Special Designations**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0006-7 | Defenders of Wildlife, Mark Salvo | Wildlife Association | It is unclear if the ACEC analyzed in the SD DRMP/EIS included subsurface estate. There is a discrepancy in the SD DRMP/EIS ACEC report (Appendix T). The summary information for the analysis indicates the ACEC would be 96,379 surface acres, while the relevance and importance evaluation includes an additional 289,899 subsurface acres (1143, Appendix T) (which is the only specific reference to 289,899 subsurface acres anywhere in the SD DRMP/EIS and appendices). The SD DRMP/EIS also states throughout the document that the conservation alternative would reserve 93,266 acres of surface estate and 289,563 subsurface acres in PPAs, which would be designated as ACECs. The final RMP/EIS should clarify how many surface and subsurface acres were considered for ACEC designation. | The ACEC designation applies to surface estate; however other restrictions or closures may apply to subsurface (mineral) estate within the ACEC as shown in the summary of restrictions in Chapter 2, the summary of mineral restriction closures and withdrawals in the Summary of Alternatives minerals section and the oil and gas stipulations in Appendix E1-E4. Minor differences in acres for surface and mineral estate within the proposed sage grouse ACEC were found between some sections of the draft RMP/EIS and were corrected in the final RMP/EIS. |
| DR-MTDK-SD-13-0011-39 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | At least four inches of herbaceous stubble would remain in the riparian areas within Fort Meade ACEC after the grazing treatment or rotation has been completed to promote sediment filtering.<br><br>SD IWLA disagrees with this management alternative. This language is inconsistent with monitoring guidelines and grazing practices found elsewhere in the RMP and it also disregards measurement of more important, critical rangeland component parts to determine net ecological effects of grazing. SD IWLA does not support simplistic grazing management goals that fail to recognize vegetative diversity and ecologically sound, healthy, plant height density characteristics. Simply assigning what appears to be a random value of 4 inches of stubble without considering vegetation cover types, growth characteristics, moisture regimes, and range condition class does not, in our estimation, achieve an ecologically sound standard of herbaceous cover left un-grazed nor | BLM recognizes that no single factor or characteristic of a riparian site can provide a complete picture of the site's health. For this reason BLM SDFO utilizes the indicators found in the riparian standard for rangeland health standards (MT/Dakotas Standards 1997). Page 18 of this document provides very specific criteria that must be met including hydrological process, erosional deposition, and vegetation conditions. The timing and duration of grazing as well as the regrowth periods provided by the Fort Meade and Bear Butte Allotment Management Plans provide a level of protection beyond residual stubble height measures. Grazing at the Fort Meade and Bear Butte Allotments is managed under a rotational grazing system to benefit wildlife, riparian and rangeland resources and limit conflicts with other uses. Allotment Management plans provide specific objectives for management of grazing within individual allotments. Should riparian condition decline as a result of livestock grazing, BLM would modify the stubble |

**Table W-1**
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| | | | does it provide protections for cover types that should not be exposed to any level of grazing due to their sensitivity. | height limit through Allotment Management (project level) planning. |
| DR-MTDK-SD-13-0011-6 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA is concerned that BLM has chosen not to develop any Areas of Critical Environmental Concern apart from The Historical Fort Meade management area and those focused on greater Sage Grouse conservation efforts. We suggest here that there are several areas administered by the BLM that should be considered and developed as ACEC's; namely parcels located within riparian zones, riverine systems, large, contiguous unique parcels such as those found near the Two Rivers Ranch in Meade County, Deep Creek in Eastern Pennington County, The Willow Creek Complex in Butte County east of Newell and other larger tracts that represent unique, wildlife habitats that are essential to maintaining big game, small game and non-game wildlife. We specifically point out that there are areas within riverine environments that contain highly degraded and aging stands of eastern Cottonwood (Populus deltoids) that are not regenerating. | Over 95% of the surface ownership in these riverine systems is comprised of private land intermixed with parcels of State land. Nearly all of the BLM administered surface estate is in the uplands in these areas. The BLM, SDFO completed a thorough review of areas of interest that were identified by the RMP interdisciplinary team and the public and documented the relevance and importance as required for evaluation of potential ACECs as shown in Appendix T. BLM found no other areas except the Fort Meade ACEC, sage grouse PPAs and the Fossil Cycad ACEC that meet this criteria. BLM received no other ACEC recommendations except for the areas listed above. |
| DR-MTDK-SD-13-0016-1 | National Parks Service, Martin Sterkel | Federal Government | The Bureau of Land Management (BLM) should recognize the Trail as a special designated area warranting special management direction and protection in the Resource Management Plan (RMP). It states on page 436 of the draft RMP that the South Dakota Field Office hosts no National Historic Trails. However, there are BLM-administered lands and a Federal mineral estate in Stanley County, South Dakota, that are proximate to the Trail [Figure 3-21 and Map 1- 3]. According to the draft plan, Stanley County contains 6 percent of the planning area's public lands and 7 percent of the Federal mineral estate. Management of these lands has the potential to impact the unique values of the Trail. | Wording changed to clarify no BLM surface management and few acres of subsurface minerals. The auto route is not a designated National Historic Trail. SEC. 3. [16USC1242] (a) (3). Only those selected land and water based components of a historic trail which are on federally owned lands and which meet the national historic trail criteria established in this Act are included as Federal protection components of a National Historic Trail. To protect these trails, A ½ mile NSO stipulation, a renewable energy ROW exclusion and a general ROW avoidance restriction have been added as an action to the Preferred Alternative to address BLM administered lands near the trail. In the case of the |

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**Comments Related to ACECs and Special Designations**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | In 1983, the NPS selected a water-based trail for retracement of the historic route in the Lake Oahe Segment of the Trail, which extends from the Oahe Dam to the Fort Rice Recreation Area in North Dakota. Special consideration should be given in the RMP to protecting the historic setting and visitor experience from both the reservoir and the Lewis and Clark auto route. Potential development of energy resources and the associated impacts, including cumulative, are of concern. | Lewis and Clark Trail, this stipulation would apply to the water portion and extend ½ mile from the water's edge. |
| DR-MTDK-SD-13-0021-2 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | BLM needs to identify wild areas without conflicts with mining and energy development. We suggest the 2 Rivers area or part of the as a back-country and primitive recreation focus and that BLM makes that an objective via the DEIS. | One of the goals of the RMP is to provide for a range of recreational opportunities (pg. 21), while minimizing adverse impacts to other resources. Future travel management planning will provide the opportunity for specific area decisions. |
| DR-MTDK-SD-13-0021-3 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | We do not find the analysis in Appendix U that decides the river is not Remarkable, convincing. DEIS acknowledges potential for interior least terns and piping plover, we assume the Cheyenne River is where they would occur. We believe lack of access and roads along the River helps to make the River wild and remote in quality, which is a value important to wild and scenic rivers. | The 28 parcels of BLM administered public land along the Cheyenne River do not provide contiguous habitat conditions such that the biological needs of the species are met under BLM's management alone. The lack of access is attributed in part to the preponderance of private land along the river segment. Lack of public access is not a criterion described in the Outstandingly Remarkable Values, and presence of least terns or piping plover does not elevate an area to the status of possessing Outstandingly Remarkable Values. |
| DR-MTDK-SD-13-0024-2 | South Dakota Wildlife Federation, Chris Hesla | Wildlife Association | We would like to see considerations in the RMP for the special area known as the "Two Rivers" area. The "Two Rivers" area is located at the confluence of the Belle Fourche and Cheyenne Rivers, the two major rivers draining western South Dakota. BLM owns large blocks of property in the breaks along the rivers (above the rivers, not in the rivers' valleys) near this intersection. While these large chunks are separated by private land, they are clustered close to each other. The area is rugged, | Appendix T details the process used in analyzing Areas of Critical Environmental Concern. The Two Rivers area was not identified either internally or externally as requiring special management attention to protect and prevent irreparable damage. |

**Table W-1**
**Comments Related to ACECs and Special Designations**

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| | | | has pines and shrubs in valleys and is difficult to access. | |
| DR-MTDK-SD-13-0046-2 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Throughout the document, references are made as part of Alternative C to designate all PPAs as an ACEC. Additionally throughout the document, statements are made that an ACEC designation decreases management options, most notably that such a designation "may shift and concentrate future activities or infrastructure development onto private or non-federal lands adjacent to the PPA" • and "the BLM would lose control over project design features, hazardous materials management, and mitigation of site-specific impacts, and would not be able to require disturbed areas to be reclaimed." • Therefore,-in light of the information contained in the DRMP/EIS and with the difficulties of managing a mostly checkerboard pattern of BLM ownership, we are not encouraging the BLM to designate all PPAs as an ACEC as is done in Alternative C as this option may not be an adequate regulatory mechanism overall for the management of the GSG in South Dakota. However, such a designation for portions of the PPAs, especially in Butte County with more contiguous areas of BLM ownership, may be an appropriate management option, and we encourage the BLM to consider using the ACEC selectively in the FRMP/EIS to assist GSG management. | Implementation of an ACEC in Butte County would likely be difficult to sign and implement. Specifying only a portion of the PA as an ACEC would be difficult to implement because of land ownerships patterns on all portions of the PAs. The Proposed Action in the proposed RMP/Final EIS does not designate sage-grouse habitat in PAs as an ACEC. |

**Table W-2**
**Comments Related to Air Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0007-1 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | BLM conducted near-field modeling to disclose potential impacts to the National Ambient Air Quality Standards (NAAQS) in the South Dakota planning area, which included an assessment of potential impacts to 3-hour S02 concentrations. We thank BLM for including 3-hour S02 impacts in the Draft RMP/EIS and Air Resources Technical Support Document (ARTSD) based on our comments on other RMPs.<br><br>Modeled concentrations have been presented for 3-hour S02 and the background concentration for S02 has been assumed to be zero. Including background concentrations is necessary to assess total air quality conditions, as well as to assess potential air quality impacts for comparison to the NAAQS. S02 data at Wind Cave and Badlands monitors in South Dakota from 2009 to 2012 indicates that the mean ranges from 0.12 to 1.6 ppb and the 99th percentile ranges from 2.6 to 10 ppb. We recommend that the Final RMP/EIS include a representative 3-hour S02 background concentration for the 3-hour S02 near-field air quality model NAAQS compliance demonstrations or explain why a background concentration of zero has been assumed. | The South Dakota Department of Environment and Natural Resources (Rombough, 8/14/2012) provided a 3-hour SO2 background modeling concentration of 0.0 ppm based on the design value (which includes rounding to the appropriate significant digit). This value was included in the AERMOD modeling protocol. |
| DR-MTDK-SD-13-0007-2 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | The ARTSD, p.6, states that Tier 4 emission standards were assumed in the Draft RMP/EIS near-field modeling analysis in order to demonstrate compliance with the 1-hr N02 NAAQS. We note that the ARMP, Section 6.1, initial mitigation requirement for diesel drill rig engines >200 hp to meet Tier 4 emission standards for non-road diesel engines indicates that "oil and gas operators may use drill rig engines that exceed Tier 4 emission standards if modeling demonstrates compliance with the NAAQS and protection of AQRVs." We assume that this caveat means that additional near-field modeling will be required at the project-level if higher-emitting engines | See the discussion in Appendix S.1, Section 6.1. Text has been revised to state that modeling or monitoring may be used to demonstrate compliance if non-Tier 4 engines are used. Demonstrations may be made at the project level or at a programmatic level. |

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| | | | will be used. We recommend the Final RMP/ EIS and ROD include this commitment. | |
| DR-MTDK-SD-13-0007-3 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | We also note an inconsistency between the ARMP and Draft RMP/EIS Chapter 4, Environmental Consequences. Section 6.1 of the ARMP includes an initial mitigation measures list that does not include a requirement for drill rig and completion engines greater than 750 hp to meet Tier 4 generator set emission standards even though this was the emission rate used in the near-field modeling exercise (see the ARTSD, page E-1, for modeled drill rig emissions). Both the Draft RMP/EIS Chapter 4 (page 487) and the ARTSD (page 6) reference this assumption. Based on conversations between our staffs, we understand that BLM's near-field modeling analysis included the Tier 4 generator set emission rate for engines greater than 750 hp in order to be representative of what is currently happening in the field (based on BLM experience), and that BLM does not believe requiring Tier 4 generator set emissions standards for engines greater than 750 hp is necessary to demonstrate compliance with the 1-hour N02 NAAQS. To disclose BLM's intent, we recommend that the Final RMP/EIS include the following:<br>• Clarification regarding which mitigation measures were necessary to ensure compliance with the NAAQS; and<br>• An explanation as to why BLM believes not requiring drill rig and completion engines greater than 750 hp to meet Tier 4 generator set emission standards will demonstrate compliance with the 1-hour N02 NAAQS. | In response to an earlier EPA request under the MOU that larger drill rig and completion engines be modeled, the BLM modeled the largest engines expected to be operating in the planning area. Based on research and discussions with BLM fluid mineral staff, the BLM determined that these largest engines are genset engines. Smaller engines may be used for some wells and they may not be genset engines. At the planning stage, the BLM cannot model every combination of size and type of engine that could conceivably be used in the future. The BLM's approach is reasonable, but conservative, and demonstrates compliance with the NAAQS. |
| DR-MTDK-SD-13-0007-4 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | The ARMP Section 6.2.1, Monitoring-Based Thresholds before Photochemical Grid Model (PGM) Completion, indicates that prior to completion of the PGM analysis, monitoring-based thresholds for determining enhanced mitigation would be based on evaluation of monitored | Future photochemical grid modeling (PGM) will assess cumulative impacts. Consideration of future mitigation will be triggered only if modeling predicts violations of NAAQS or MAAQS. Monitoring-based exceedance data are more reliable than model-predicted |

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| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | exceedances of the NAAQS. The discussion of modeling-based thresholds for evaluating enhanced mitigation (Section 6.3.1), differs by stating that enhanced mitigation would be based on "potential future impacts" on NAAQS. To provide clarity regarding the trigger and consistency within the ARMP, we recommend replacing the language in Section 6.2.1 and 6.3.1 with "modeling-based thresholds for determining enhanced mitigation would be based on potential future NAAQS exceedances as predicted via future PGM." | exceedances, particularly with regard to PGM, which includes input data spanning 48 states. Any exceedances predicted by PGM will be evaluated in the context of monitored data and air resource trends. |
| DR-MTDK-SD-13-0007-5 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Finally, we recommend the following edits to the Draft ARMP to clarify terminology and/or to reflect recent discussions of the AQTW:<br>• ARMP pages 1113 - 1116: We understand that BLM intends to run the PGM to cover the full 20 year planning cycle of the RMP rather than performing an initial PGM run followed by periodic reassessments as described in Section 5.1.2 on page 1114. We recommend revising the text to clarify this point. In addition, we recommend revising Table 8.4., to include time in the schedule for the AQTW to review results from emissions modeling.<br>• Section 6.2.3, indicates that following PGM completion, BLM would calculate design values for each pollutant monitored at a federal reference monitor within the planning area. For regulatory purposes, the EPA treats data from Federal Regulatory Monitors and Federal Equivalent Monitors similarly. For some criteria pollutants, such as ozone and S02, all or nearly all regulatory monitoring is done with Federal Equivalent Monitors. For completeness, we recommend the BLM use the phrase "Federal Reference or Equivalent Monitors" when it discusses the monitors to be used.<br>• Section 6.2.4, does not include a timeline for implementation of enhance mitigation after the PGM is completed. We recommend a 1-year timeline for | • See the discussion in Appendix S.1, Section 5.1.2 and Table 3.<br>• See revised language in Appendix S.1, Section 6.2.3.<br>• See the discussion in Appendix S.1, Section 6.3.2.<br>• Section references have been updated. |

**Table W-2**
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| | | | implementation of measures after selection of enhanced mitigation, similar to the timeline provided for implementation of enhanced mitigation measures prior to PGM completion (see Section 6.2.2: "selected mitigation measures would be implemented within I year after the BLM decision to apply additional mitigation," or Section 6.3.2: "Modeling-Based Enhanced Mitigation Measures").<br>• General Comment: We note numerous typographical errors referencing "section 0." It appears this placeholder was not updated prior to printing. We recommend ensuring that these references will be addressed in the Final RMPIEIS. | |
| DR-MTDK-SD-13-0007-6 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Air Resource Technical Support Document<br><br>It is important that the emissions controls and mitigation measures used to develop the emissions inventory be included as required mitigation measures for activities under the RMP. The alternative specific emissions inventory includes a 50% or 75% control efficiency for calculating dust emissions. The ARTSD, p. 6 identities assumptions used in this emissions inventory, including a 50% fugitive dust control efficiency for dust suppression but no mention of a 75% control. If 75% control efficiency was used in the near-field modeling for some sources, then we recommend that these sources and this control efficiency be added to the identified assumptions on p. 6 of the ARTSD. We also recommend that these control measures be added to the initial mitigation list of the ARMP, Section 6.1. | Near-field modeling was based on an AERMOD modeling emission inventory that assumed 50 percent fugitive dust control during construction. See Appendix F of the Air Resource Technical Support Document (ARTSD). |
| DR-MTDK-SD-13-0007-7 | US Environmental Protection Agency, Suzanne | Federal Government | In addition, we have a few recommendations for clarification of the ARTSD, as follows:<br>• pp. 14- 15: Figure 1 illustrates the well pad and receptor layout for PM 10 and PM25 modeling. Please clarify | • A description of production sources is proved in Section 2.2 of the ARTSD. A clarification stating that well pad and receptor layouts for other (non-PM) modeled pollutants were similar for other pollutants was |

**Table W-2**
**Comments Related to Air Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | Bohan | | whether this same receptor layout was used for the other criteria pollutants.<br>• p. 17: The background concentration for 3-hour S02 is listed as being zero in Table 14. As discussed above, please ensure that a representative 3-hour so2 background concentration is used for the 3-hour S02 near-field air quality model NAAQS compliance demonstrations or explain why a background concentration of zero has been assumed.<br>• pp. 19-20- Predicted criteria air pollutant concentrations were compared to the NAAQS and Prevention of Significant Deterioration increments. For disclosure purposes, we recommend the annual comparisons for the NAAQS be discussed in this paragraph. | added in Section 3.3 of the RMP.<br>• See response to Comment SD-13-0007-1.<br>• Annual comparisons to the NAAQS and MAAQS are provided in Table 16 of the ARTSD for those pollutants with annual averaging times. |
| DR-MTDK-SD-13-0015-8 | Public Lands Advocacy Clair Moseley | Consumer Group | FLPMA does not grant BLM the authority to establish an air quality and management program separate from the State of South Dakota to regulate air quality. The goal of the South Dakota Air Quality Program is to "maintain air quality levels in South Dakota that protect human health, safety and welfare and the National Ambient Air Quality Standards established through the Federal Clean Air Act. The department achieves this goal by monitoring the ambient air quality throughout the state, permitting businesses and facilities that emit air pollution, and ensuring compliance with the state laws and rules." | BLM has not created an air quality program separate for the State. BLM has coordinated with the State in the development of an air quality plan for BLM administered lands through the RMP planning process. Any monitoring that is conducted will be done in coordination with the State. |
| DR-MTDK-SD-13-0026-1 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | In the Executive Summary, Air Quality Related Values should be briefly discussed along with Air Quality in the Physical Resources Air Section. | The Executive Summary mentions AQRVs and “air resources,” which include AQRVs. |
| DR-MTDK-SD-13-0026-2 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | Chapter 3 Affected Environment, Particulate Matter, 2nd paragraph (page 306) -- Add: Fine particulate also contributes to reduced visibility in nationally important areas such as national pars "and wilderness areas." | Text has been revised in Chapter 3, Air Resources, Particulate Matter section. |

**Table W-2**
**Comments Related to Air Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0026-3 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | VISCREEN is addressed in the Appendix, but is not described in Chapter 4. The "Far-field AQRV Impacts" section be renamed to "AQRV Impacts" and should include the commitment to perform near-field analysis.<br><br>In the discussion of all the Chapter 4 alternatives, it states that future PGM modeling will be used. The statements should reference both limited AQRV analysis that will occur now and the PGM modeling analysis that will occur in the future to evaluate potential air impacts. | See the summary of VISCREEN results in Chapter 4, Air Resources, Impacts Common to All Alternatives, AQRV Impacts. |
| DR-MTDK-SD-13-0026-4 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | The FWS does not necessarily support the statement "Potential total nitrogen and sulfur deposition would likely remain below the levels of concern (3.0 kg/ha/yr and 5.0 kg/ha/yr, respectively)". FWS needs to evaluate these level of concern numbers and potentially provide supportable deposition values. FLAG 2010 suggests that incremental emission increases from development should be evaluated using the DATs. p.493 | Language in Appendix S.1, Section 1.1 has been revised. |
| DR-MTDK-SD-13-0026-5 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | AQRV impacts are not assessed as a function of "new" versus "existing" air quality emission levels. Although referenced as a subjective analysis, FLAG guidance does not support such a determination. | See the Air Appendix, Air Resource Management Plan, Section 5.1 for discussion. Cumulative impacts including new and existing emissions will be modeled using photochemical grid modeling to assess air quality and AQRV impacts. |
| DR-MTDK-SD-13-0026-6 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | Summary/averaging current visibility conditions at Class I areas is relevant to cumulative (regional haze rule) evaluation. Incremental analysis being conducted between draft and final EIS development will not consider this averaging. | Analysis of Class I visibility modeling results was performed in accordance with the Federal Land Managers' Air Quality Related Values Work Group (FLAG) modeling guidance. The BLM conferred with the FWS during post-processing and the FWS had an opportunity to comment on results presented in an informal report to the AQTW. |
| DR-MTDK-SD-13-0026-8 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | 7. In the Glossary add the term "Air Quality Related Value", and "Sensitive Class II Areas." 8. In the Index add "Air Quality Related Values" and the associated pages where this is referenced. | These terms have been added to the Glossary and the Index. |

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| DR-MTDK-SD-13-0026-7 | United States Fish and Wildlife Service, Catherine Collins | Federal Government | The statements that the "Air Resource Management Plan and Adaptive Management Strategy" was "prepared in collaboration" under the oil and gas MOU may not accurately reflect our understanding of what was discussed in the air quality technical workgroup. FWS was not fully aware of the intent to utilize an Adaptive Management Strategy and its associated methods in the future. The FWS Branch of Air Quality would like to request a meeting or conference call with BLM on a staff and management level to discuss this strategy and its associated agreements. | The BLM introduced the adaptive management strategy during a meeting with the FWS on February 22, 2012 and discussed this issue with the FWS during subsequent Air Quality Technical Workgroup (AQTW) conference calls. |

**Table W-3**
**Comments Related to Climate Change**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0006-4 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The SD DRMP/EIS recognizes that climate change is a planning issue (xiv) that poses a challenge to resource management (315-319) and notes that "[s]ensitive species in the planning area that are already stressed by declining habitat, increased development, and other factors, could experience additional pressures due to climate change" • (318). These additional stressors may include reduced soil moisture, severe or prolonged drought, diminished water quantity, increased wildfire (317-318), which could have deleterious effects on sage-grouse (358). However, and although the plan has a goal of supporting ecosystem resiliency to ameliorate the stresses from climate change (18; 83, Table 2-2, Goal 3), it fails to prescribe meaningful measures to achieve that goal. As a regional management plan, the SD DRMP/EIS has both the opportunity (due to scale) and responsibility (Secretarial Order 3289, 02-22-2010) to implement needed management changes to maintain and increase ecosystem resilience in the planning area. | Adapting to climate change is an ongoing process because the effects of climate change on ecosystems and species is not always as expected. Allowing for flexibility in light of new information is the best approach to planning for the effects of climate change and this is incorporated into the Proposed Action for the Final SD RMP. Unrestricted development would not be permitted by BLM because of multiple resource concerns and a mandate to manage for multiple resources. Many of the protective measures for other resources would have a positive impact in reducing emissions. |
| DR-MTDK-SD-13-0007-23 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | (8) Climate Change<br><br>The BLM has included an analysis and disclosure of greenhouse gas (GHG) emissions and climate change. We note that the GHG emissions inventory does not include oil and gas emissions from "downstream" activities such as refining that will occur outside the Planning Area. Because information on these "downstream" indirect GHG emissions from activities may be of interest to the public in obtaining a complete picture of the GHG emissions associated with BLM-authorized activity in the Planning Area, it may be helpful to estimate and disclose them. | The BLM does not have sufficient information to estimate GHG emissions from downstream activities. |
| DR-MTDK- | Izaak Walton League of | Environmental Protection | BLM would consider the potential impacts of climate change on disturbed or degraded areas when determining | A host of environmental variables are considered when seed mixes are developed. Climate change is |

**Table W-3**
**Comments Related to Climate Change**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| SD-13-0011-20 | America, Gerald Schlekeway | Association | the type of reclamation or the seed mix needed for reclamation. The only reason we comment on this statement is to point out that climate change considerations should be encapsulated into a single, new section of the planning document that uses predictive models to ascertain a broad range of possible effects climate change may have on the varied resources found on BLM managed lands. This action would follow the NEPA directives for thorough explanation of potential impacts from yet another potentially harmful, yet uncontrollable series of events. While the plan document does discuss climate change, the commentary seems to be treated casually and with greater speculation than is currently possible within the context of climate change science. USGS and other national and state organizations are preparing and revising all manner of climate change models that can inform and prepare managers with information that can be used in making long range planning decisions. Simply stating that the parameters of climate change will dictate options for site reclamation and seed mixes seems to be a minimal response to a much larger and more complex issue. | considered and as new information is learned seed mixes can be changed at the implementation level to address the new information. |
| DR-MTDK-SD-13-0011-9 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The SD IWLA has concerns about climate change and is therefore interested in a better explanation in the planning documents how the BLM intends to address the effects of climate change with specifics on water conservation, wildlife habitat mitigation, invasive species, and state wildlife species of special management concern | Refer to Chapter 3 climate change section and the climate change and the wildlife, special status species section of Table 2-3. |
| DR-MTDK-SD-13-0029-1 | World Wildlife Fund, Martha Kauffman | Wildlife Association | Evaluate actions in a landscape context<br><br>The South Dakota Field Office should continue to consider the importance of its actions in context of the greater landscape especially in relation to creating | Thank you for the comment. |

**Table W-3**
**Comments Related to Climate Change**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | resiliency to climate change and ensuring connectivity to habitat outside of the planning area for species that require it. Managing at larger landscape scales is important because climate change is likely to increase ecosystem vulnerability. We commend the South Dakota BLM for recognizing this through efforts such as working with the Joint Ventures and the national sage-grouse planning effort. Because of this, the South Dakota Field Office should continue to incorporate recommendations from large-scale regional planning and assessments such as the BLM's Rapid Ecological Assessments in the RMP revision as they become available. | |
| DR-MTDK-SD-13-0045-3 | United States Forest Service, Dennis Aeger | Federal Government | It was not clear to us which global circulation or other model(s) might have been used in the analysis. For example, in Chapter 3 on pgs. 315-317 the Trends and Temperature and Precipitation sections refers to modeling and predictions, but it is unclear if modeling was conducted and which models were used. In Chapter 3 we note that a metric ton is 2204.6 pounds, rather than 2005 (Draft RMP/EIS, pg. 314). We believe the DEIS contains some good analysis of emissions estimates on pgs. 505-507. | The typographical error in the metric ton conversion factor has been corrected. The sources for the charts and tables in this section are listed at the bottom of each chart and table. |
| DR-MTDK-SD-13-0045-4 | United States Forest Service, Dennis Aeger | Federal Government | We note the discussion in Chapter 3 on carbon storage. The Forest Service recently issued a new publication, Resource Bulletin NRS-83, entitled Forests of the Black Hills National Forest, 2011. This publication is designed to support land management decision making, primarily on NFS lands, but it contains information on carbon storage on forested lands which may be useful to the BLM for assessing lands of similar characteristics in the area. The publication is available on-line at: http://www.nrs.fs.fed.us/pubs/43882 | Thank you for providing this comment. This document has been reviewed. |

**Table W-4**
**Comments Related to Cultural Resources and Livestock Grazing**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0030-15 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | BLM Washington Office Instruction Memorandum (IM) No. 2012-169 states, "[I]n nearly all cases. . . the range of alternatives for an RMP/EIS will include one or more alternatives with a meaningful reduction in either lands available for grazing, forage amounts, or both." •<br><br>The DRMP fails to meet the requirements of this IM because it does not consider meaningful reduction in lands available for grazing or forage amounts. The draft plan alternatives would permit grazing of an average of 73,400 AUMs on 271,000 or 77,300 AUMs on 272,000 acres. 52 Three of the four alternatives consider adding new grazing allotments in the Exemption Area.<br><br>The only limitation to grazing proposed in any alternative relates to conflicts between domestic and bighorn sheep. Alternative A provides no buffer zone between bighorn sheep and domestic sheep and goats while the others require a buffer zone. While buffer zones are better than nothing, BLM should consider removal of sheep and goats from allotments within 50 miles of bighorn sheep habitat, as that removal would bring other benefits to the environment as described in this comment.<br><br>Meaningful alternatives must define specific measurable terms and conditions for livestock grazing. BLM must develop alternatives that chart a rapid, site-specific path forward to ensure protection of remaining native vegetation communities through passive restoration. BLM must prioritize areas based on habitat recovery needs, connectivity (reducing habitat fragmentation) and population viability needs, and other vital information necessary to maximize | This IM states that in most cases the RMP will consider a reduction of grazing. NEPA requires agencies to identify issues and address them through a set of management alternatives. In this case, adverse impacts as a result of livestock grazing was determined to not be an issue as over 90% of lands meet standards for rangeland health and only two percent are not meeting standards due to current grazing practices. While the RMP does evaluate a very slight decrease in grazing under Alternative C, a major decrease in grazing or elimination of grazing is considered but not evaluated further. To evaluate a reduction in grazing for the SD RMP, under the circumstances described above, an arbitrary reduction number would need to be chosen since there are no issues with current grazing practices. It is not the intent of NEPA to base alternatives on arbitrary numbers or non-issues. Given the circumstances, the alternatives provided include a reasonable range of Alternatives.<br><br>BLM has based the buffer between bighorn sheep and domestic sheep on BLM's internal guidance and recommendations by SD GFP in order to limit disease transmission between domestic sheep and bighorn sheep. Retirement of grazing privileges and alternatives that address grazing can be found Chapter 2, Summary of Alternatives, Livestock Grazing Section. |

**Table W-4**
**Comments Related to Cultural Resources and Livestock Grazing**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | sagebrush ecosystem protections and efficiency of recovery and protection.<br><br>BLM must fully analyze environmental effects of the No Grazing Alternative in depth. This includes conducting a full and fair capability and suitability analysis, where lands with significant conflicts with grazing are removed and retired from grazing disturbance impacts. This analysis is essential to set a solid comparative effects baseline and fully understand the significant ecological toll of any continued grazing use. | |
| DR-MTDK-SD-13-0030-5 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | Comment: The BLM must consider the impacts of proposed livestock grazing throughout the planning area on the important cultural and historic resources found on these public lands. Trampling, displacement, desecration, and degradation are all possible impacts of livestock grazing; the RMP/EIS must provide specific tolerance parameters, monitoring, and other requirements to ensure for the protection and preservation of these areas. | The National Historic Preservation Act (NHPA) requires federal agencies to consider effects of federal undertakings on historic properties prior to making a decision or taking an action. Federal agencies meet this requirement by completing the Section 106 consultation process set forth in the regulations, including consulting with certain specified parties, such as the state historic preservation officer (SHPO) and Native American tribes, if relevant. Under Section 106, the process concludes with an agency finding of "no historic properties affected," "no adverse effect," or "adverse effects." 36 CFR 800.6.<br><br>The National Environmental Protection Act (NEPA) expanded the environmental review process to require federal agencies to consider effects of proposed federal actions on the environment more generally. Federal agencies meet the NEPA requirement by preparing an environmental review document, which consists of a categorical exclusion (CE), an environmental assessment (EA) or an environmental impact statement (EIS), depending on the level of potential impacts. Neither statute mandates a |

**Table W-4**
**Comments Related to Cultural Resources and Livestock Grazing**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | particular outcome, but rather under both statutes, the impacts must be considered and the required processes must be followed.<br><br>BLM archaeologists are cultural resource managers who consider the impacts of all projects throughout the planning area for the importance of cultural and historic resources. In this process, we work closely with the South Dakota SHPO, tribes, and Advisory Council for Historic Preservation (ACHP) to minimize impacts to all cultural and historic properties identified with the planning area. This process involves specific tolerance parameters, monitoring, and other requirements to ensure for protection and preservation of all historic properties.<br><br>BLM evaluates the impacts of livestock grazing through rangeland health evaluations and through allotment compliance monitoring and cultural surveys prior to installing range improvements. Proposed projects in areas with cultural resources are avoided and projects relocated or denied. Livestock grazing use in the planning area is generally dispersed over a large area and few adverse impacts to cultural resources have been documented. All of these actions would continue as the RMP is implemented. |

**Table W-5**
**Comments Related to Facilities and Public Safety**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0025-6 | United States Forest Service, Mary Erickson | Federal Government | Erionite presents a risk to human health in Harding County. We are interested in the measures that will be taken to reduce risk of eroinite. | There are very few areas on BLM administered lands with source rock containing erionite. BLM has a GIS layer with these layers, and would consider risks to public safety as projects are proposed and evaluated. |
| DR-MTDK-SD-13-0032-1 | Cindy Brunson | Individual Consumer | I'm a landowner within the Depot, and have researched about the history of the site. I view it as a place of great history since it played a very vital role in WWII in the war effort. It continued to contribute to our military up to closure when the last ammunitions were shipped to Vietnam. Some ordnance was despsied of directly on site of base. This included mustard gas and other chemicals.<br><br>The location your plan on leasing is near the chemical area of the base. The ordance that was destroyed on site and buried was to be identified on a map.<br><br>This was not always done. On our property we found a disposal site of white phosphorus that one knew nothing about. The safety is my concern about all of the unknown within the depot. The BLM has vast lands that they can drill on without having to worry about ordance they may hit on the former BHAD. The abandoned Black Hills Army Depot has historical value as it played a vital role in WWII and contributed to our military until the Vietnam War. In the course of this project we came to know that The 21,000 acre BHAD is the worst chemical warfare agent dumping ground in the country. Thousands of tons of chemical warfare agents in metal cannisters were dumped in over 200 miles of trenches, across the depot and left to rot. The cannisters have rotted and the contents have in some cases interacted with other dumped contaminants to create a lethal and largely unrecoverable toxic mess.<br><br>Chemical warfare agents present on the BHAD which | BLM has proposed too close the Federal minerals within the BHAD to Oil and Gas leasing and exploration in Alternative C and D (preferred Alternative) because of concerns about hazardous materials and the historical value of this area. The abandoned Igloo townsite would have No Surface Occupancy restrictions because of its historical value. Standard lease stipulations would apply to areas outside of the BHAD and Igloo areas |

**Table W-5**
**Comments Related to Facilities and Public Safety**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | operated from 1941 to 1968 include but are not limited to sarin, soman, toban, GB, VX, Lewisite, Mustard gas, phosgene, white sulfur and many types of more conventional explosives. These plus other military based refuse were disposed of by burial, often in the miles of trenches. It would be extremely dangerous to drill into these formations. Disturbing the underground structures is likely to cause a chemical release that we could not control. This is also an earthquake prone area<br><br>These chemical warfare agents are generally so lethal. that the amount on a pin head can kill a 250 lb person, the amount in the back of a pick-up can take out a city the size of Denver. Most are soluble in water and oil and never decompose.<br><br>The Wind Cave structure also runs under the BHAD site, further complicating the problem of these chemicals pooling underground. Given the extensive cave structure and the porous nature of the Pierre Shale formation it is a good bet that substantial quantities of some of these chemicals lay in pools underground.<br><br>It would be extremely dangerous to drill into these formations. Disturbing the underground structures is likely to cause a chemical release that we could not control. This is also an earthquake prone area. | |
| DR-MTDK-SD-13-0036-1 | Susan Henderson | Individual Consumer | I served as the Chairperson for the Restoration Advisory Board which was mandated by Congress to review progress on the clean-up for 10 years. I reviewed thousands of documents regarding the administration of the BHAD and concluded that it is a terribly dangerous site. Because one cannot safely drill into the site, the Corps of Engineers contented itself with installing shallow monitoring wells on the perimeter. They are | BLM has proposed to close the Federal minerals within the BHAD to Oil and Gas leasing and exploration in Alternative C and D (preferred Alternative) because of concerns about hazardous materials and the historical value of this area. |

**Table W-5**
**Comments Related to Facilities and Public Safety**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | attempting to monitor the movement of these chemicals by testing the monitoring wells. However they, admit that the chemical warfare agents are percolating down through the earth and are moving in unpredictible ways.<br><br>In short, I believe that it is absolutely essential that we not disturb the underground structure with drilling programs of any kind because we might get these chemicals moving in the water or oil deposits. Please note that these chemicals are soluble in water and oil and never decompose. Burning at temperatures higher that needed to melt steel merely changes them into a lethal gas. | |
| DR-MTDK-SD-13-0036-2 | Susan Henderson | Individual Consumer | I recommend that you contact the US Army Corps of Engineers in Omaha and the EPA Region 8 in Denver as both are very knowledgeable and concerned about the BHAD. Key documents that you should review are the BHAD Archive Search Report and Supplement and the Current Remediation work plans authored by the Corps of Engineers about 1993. | BLM has reviewed EPA, State of SD and COE documents regarding the BHAD including reclamation plans and will continue to work with these agencies. |
| DR-MTDK-SD-13-0037-1 | Henderson Ranch, Susan Henderson | Individual Consumer | Do not allow oil and gas exploration or horizontal drilling within and near the boundaries of the former Black Hills Army Depot, located in southwestern Fall River County, SD. The 21,000 acre BHAD is the worst chemical warfare agent dumping ground in the country. Thousands of tons of chemical warfare agents in metal cannisters were dumped in over 200 miles of trenches, across the depot and left to rot. This occurred over 60 years ago. Now the cannisters have rotted and the contents have in some cases interacted with other dumped contaminants to create a lethal and largely unrecoverable toxic mess.<br><br>Chemical warfare agents present on the BHAD which | In the preferred alternative, BLM has proposed to close the Federal minerals within the BHAD and Igloo to Oil and Gas leasing and exploration because of concerns about hazardous materials and the historical value of this area. BLM has reviewed the reports that were developed to document the disposal and hazards of chemicals at the BHAD. |

**Table W-5**
**Comments Related to Facilities and Public Safety**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | operated from 1941 to 1968 include but are not limited to sarin, soman, toban, GB, VX, Lewisite, Mustard gas, phosgene, white sulfur and many types of more conventional explosives.<br><br>After 10 years of study the Army Corps of Engineers determined that it would be too dangerous to dig up materials in burial sites and trenches and generally abandoned their projected $ 5 Billion clean-up plan. At this point, the chemicals have most certainly escaped from their metal cannisters and have percolated down into the shale. The Wind Cave structure also runs under the BHAD site, further complicating the problem of these chemicals pooling underground. Given the extensive cave structure and the porous nature of the Pierre Shale formation it is a good bet that substantial quantities of some of these chemicals lay in pools underground. Disturbing the underground structures is likely to cause a chemical release that we could not control. This is also an earthquake prone area.<br><br>There have been numerous cases of dead livestock on the BHAD, many of which have occurred after some sort of disturbance of the earth had occurred. In any case, drilling into the strata of the BHAD could cause poison gas releases, dead people on the drilling rigs, and possibly contamination of the oil itself since sarin for example is soluble in water and oil. Sarin gas in an oil refinery would be catastrophic.<br><br>You may read about this site by accessing the Archive Search Report for the Black Hills Army Depot which is available from the Army Corps of Engineers in Omaha, Nebraska. | |

**Table W-5**
**Comments Related to Facilities and Public Safety**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0025-6 | Lilias Jarding | Individual Consumer | I favor Alternative C, because it closes lands to uranium mining which causes permanent damage to water, wildlife our local economy and public health | Alternative C would not close all BLM administered lands to uranium mining. While locatable minerals would not be withdrawn in areas such as ACECs or Bear Butte (under Alternative C) locatable minerals (including uranium) would be available for mineral exploration and development in other areas subject to special considerations needed to limit impacts of surface disturbance and protect other resource values while conducting activities under the operation of the mining laws. Refer to table 2-2 |
| DR-MTDK-SD-13-0048-22 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 275 - Please convey who will be responsible for the costs of burying existing power lines and will the BLM provide compensation if BLM eliminates existing power lines ? | For new applications, the project proponent would incur costs to modify project proposals if such modification is needed to bring the proposed project into compliance with BLM regulations or any other restrictions/stipulations required by the Final RMP/EIS. Refer to the Overview of the Alternatives section of Chapter 2. As noted in the Summary of Alternatives Table in Chapter 2 (Spec. Status Species section) requirements to bury power lines would apply to new projects and only those projects that can be safely buried except for cases where existing power lines are within two miles of a sage grouse lek or within sage grouse winter range. In these cases overhead power lines would be evaluated for threats to sage grouse and BLM may require the lines to be relocated or buried. In Alternative C, BLM would evaluate existing power or utilities lines for hazards and ways to mitigate the hazard to sage-grouse but there is no requirement to bury existing lines. |

**Table W-6**
**Comments Related to Fish and Aquatics**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0015-12 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 2-105, "Surface disturbing and disruptive activities would be avoided within ¼ mile of reservoirs with fisheries. Other surface occupancy and permitted uses could be limited at the project level." • (Fish and Aquatics, Management Action 4)<br><br>Page 2-105, "Public lands within ¼ mile of reservoirs with fisheries would be an avoidance area for"...other ROWs except that proposals would be considered for implementing individual ROW linear crossings if no other feasible crossing location can be found." • (Fish and Aquatics, Management Action 4)<br><br>COMMENT: BLM has provided no justification for its proposal to apply NSO stipulations to future oil and gas leases or to designate ROW avoidance areas within ¼ miles of reservoirs with fisheries and has failed to adequately demonstrate how or why oil and gas development within these distances would negatively impact water quality or fisheries or fish themselves in Chapters 3 or 4. Historic BLM buffers for oil and gas development around stream and river channels and banks have been limited to 300 to 500 feet and have proven to be a reliable mitigation measure to protect fish and water resources. In addition, BLM would allow for oil and gas leasing with an NSO stipulation within 300 feet of riparian and wetland areas in this DRMP/EIS (DRMP/EIS, p. 2-74 and 2-75): "Riparian areas, wetlands, 100 year floodplains of rivers and streams and water bodies and areas within 300 feet of these features would be managed as No Surface Occupancy and Use for oil and gas leasing." • It is not unreasonable to believe that a 300 foot NSO buffer as applied to riparian and wetland areas would not provide the same level of protection to reservoirs and streams. In addition, BLM | While water quality is an important concern, the main reason for providing a larger buffer around reservoirs is to maintain aesthetic values for recreationists that use the reservoirs for sport fishing. Sport fishing potential on streams managed by BLM is extremely limited in SD. |

**Table W-6**
**Comments Related to Fish and Aquatics**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | has not mapped these reservoirs.<br><br>BLM needs to clearly document why a 300 foot NSO buffer is believed inadequate for reservoirs. Otherwise, BLM must amend the DRMP/EIS so that oil and gas leasing would be offered with a NSO stipulation in and within 300 feet of designated reservoirs, instead of an NSO stipulation and ROW avoidance area within ¼ miles. | |
| DR-MTDK-SD-13-0047-18 | State of South Dakota | State Government | On page 105, the planning area seems to have a primary focus on lentic systems and game fish. Why were lotic systems not discussed? | BLM manages very few lotic systems in SD that have sport fishery potential. Actions to address lotic systems including NSO stipulations in lotic systems and CSUs in areas adjacent to lotic systems can be found under the water section of Table 2-2. Other actions to address lotic systems such as Bear Butte Creek and Whitewood Creek, are discussed in Table 2-2 under aquatics. |
| DR-MTDK-SD-13-0047-23 | State of South Dakota | State Government | On page 227, we suggest that "lotic and wetlands" should be inserted behind "aquatic." | Changes made as suggested. |
| DR-MTDK-SD-13-0047-49 | State of South Dakota | State Government | On pages 675, we suggest that "aquatic" replace "fisheries" in the first paragraph, third sentence under "Guidelines and Assumptions."<br><br>On page 678, we suggest that "affects foraging and other habitat for aquatic species" be added to the fourth sentence under "Aquatic Habitat."<br><br>On page 678, we suggest that "Migration barriers coupled with low flows and periods of intermittency make recolonization limited as well" be added to second paragraph, last sentence under "Direct Mortality." | The suggested changes were made to the Proposed RMP/EIS. |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0011-4 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA is concerned about the differences in grazing and grazing management strategies and policy between federal and state agencies within the planning area. We are also concerned about disparities in grazing strategies between areas of management on BLM administered lands. Grazing management guidelines, goals and objectives for private land guided in some measure, by USDA Natural Resource Conservation Service (NRCS) standards, are different than those of the BLM, the FS, or the State of South Dakota on School and Public Lands. BLM guidelines and objectives are different than those of the FS, and both are different from State School and Public Lands. These inconsistencies in policy and guidelines do not allow for sound integrated management of sage steppe ecosystems across jurisdictional boundaries. In particular, BLM, Forest Service and State of South Dakota grazing policies appear difficult to adapt to the NRCS Sage Grouse Initiative, (SGI) or EQUIP programs. The absence of uniform guidelines, goals, objectives and stated purposes for grazing management within the planning area are a source of significant concern. | The BLM SDFO coordinates management of grazing with other agencies that manage land in or near BLM managed allotments in SD. BLM's involvement with the NRCS sage grouse initiative (SGI) projects, EQUIP plans and the State's involvement with the RMP/EIS cooperating agency process are other examples of cooperation and coordination between agencies. While BLM cannot dictate the policies on lands managed by other agencies, it does strive to coordinate with other agencies and landowners to identify and work towards common goals and direction. On an Allotment Management plan level, BLM SDFO engages other agencies and landowners from the beginning of the planning process to the final plan and implementation stage. BLM frequently coordinates on an individual basis with the State, landowners, and other federal agencies when range improvements are proposed or site specific problems need to be addressed. The BLM SDFO reviews the state's wildlife actions plans and takes the state's goals, objectives and practices into account when managing resources on public lands. The Final RMP/EIS provides direction for this coordination and cooperation to continue. Information about other Federal, State and local plans that BLM considered when developing the RMP are listed at the end of Chapter 1. Additional information about coordination with other agencies can be found in Chapter 5. |
| DR-MTDK-SD-13-0015-1 | Public Lands Advocacy, Claire Moseley | Consumer Group | Under the Federal Land Policy and Management Act (FLPMA), BLM is required to manage the public lands on the basis of multiple use and sustained yield. 43 USC § 1701(a)(7) (2006)" "'Multiple use management' is a concept that describes the complicated task of achieving a balance among the many competing uses on public lands, 'including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and [uses | The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the Proposed RMP/Final EIS. BLM carefully considered the issues brought forward during scoping and developed alternatives with consideration of the requirements of multiple use management as |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | serving] natural scenic, scientific and historical values.' " • Norton v. Southern Utah Wilderness Alliance, 542 U.S. at 58 (quoting 43 U.S.C. § 1702(c)). "Of course not all uses are compatible." • Id. We recognize the difficult task the BLM faces to manage public lands in the MCFO for multiple use. However, oil and gas development is a crucial part of the BLM's multiple use mandate and the agency must ensure that oil and gas development is not unreasonably limited in the RMP.<br><br>FLPMA clearly identified mineral exploration and development as a principal or major use of the public lands. (43 U.S.C. § 1702(l)) To that end, FLPMA requires the BLM to foster and develop mineral activities, not stifle and prohibit such development. It does not appear this was one of BLM's goals when preparing the MCFO DEIS. Rather, it appears the BLM is intent upon limiting what it considers to be a damaging presence on federal lands. The BLM must reconsider its view of oil and gas development when preparing the final EIS/RMP. | described in FLPMA. The RMP evaluated a range of alternatives that provided for varying degrees of mineral use along with other uses. Comments about oil and gas development were considered when the Final RMP/EIS was completed. |
| DR-MTDK-SD-13-0015-2 | Public Lands Advocacy, Claire Moseley | Consumer Group | BLM recognized the intent of the both Phases I and II of the EPCA review when it issued Instruction Memorandum 2003-233, Integration of the Energy Policy and Conservation Act (EPCA) Inventory Results, into the Land Use Planning Process. Consequently, BLM Field Offices are now required to review all current oil and gas lease stipulations to make sure their intent is clearly stated and that stipulations utilized are the least restrictive necessary to accomplish the desired protection. Moreover, the IM directs that stipulations not necessary to accomplish the desired resource protection be modified or dropped using the planning process.<br><br>Since the purpose of integrating the EPCA results into | BLM, SDFO included an examination of least restrictive measures within the range of alternatives in the RMP/EIS. To the degree possible, the proposed action includes the least restrictive measures while still meeting BLM's obligations to protect other resources as dictated by law and policy. The stipulations included in the proposed action are the minimum degree required based on BLM's research of current science including information that was received during the public scoping and draft RMP/EIS comment periods.<br><br>The EPCA inventories were carried out in South Dakota in 2003 and 2004. EPCA provisions have been incorporated into the planning process. For instance, |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | planning is intended to determine whether existing resource protection measures are inadequate, adequate or excessive, we recommend that BLM reevaluate its management decisions accordingly and make requisite changes to the final planning documents An examination of less restrictive measures must be a fundamental element of a balanced analysis and documented accordingly in the FEIS. Moreover, under EPCA BLM is required to identify impediments to oil and gas development. It was the intent of Congress that access to energy resources be improved. BLM recognized the intent of the both Phases I and II of the EPCA review when it issued Instruction Memorandum 2003-233, Integration of the Energy Policy and Conservation Act (EPCA) Inventory Results, into the Land Use Planning Process. Consequently, BLM Field Offices are now required to review all current oil and gas lease stipulations to make sure their intent is clearly stated and that the stipulations utilized r the least restrictive necessary to accomplish the desired protection. Moreover, the IM directs that stipulations not necessary to accomplish the desired resource protection be modified or eliminated using the planning process. There mere statement that BLM has utilized the least restrictive stipulations does not constitute adequate documentation in the RMP/DEIS and does not meet the legal requirements established under the EPCA. | EPCA data was used to produce a Reasonably Foreseeable Development (RFD) Scenario, as well as the Analysis of the Management Situation (AMS). The EPCA findings were used to develop a reasonable range of alternatives in the planning document. The Uniform Format for Oil and Gas lease Stipulations was followed. Waivers, exceptions, and modifications have been assigned to stipulations. Stipulations are consistent among offices in the BLM Montana State organization. Threatened and endangered species are considered, as well as paleontological resources and cultural resources, as well peer reviewed literature to back up the need for stipulations. Lease Notices are in use. Performance based stipulations have been proposed for use. |
| DR-MTDK-SD-13-0015-20 | Public Lands Advocacy, Claire Moseley | Consumer Group | Does BLM intend to incorporate and/or work to ensure consistency of its RMP/EIS management actions with the updated South Dakota Sage-Grouse Management Plan that is expected to be finalized in 2013? What is the nature of the more detailed and up-to-date information which will be included in the state plan? | The BLM intends to continue to work with the State of SD to achieve the best level of consistency possible. The discussion about more detailed information or up-to-date information was described here to emphasize the need for BLM to address and respond to rapidly changing information. Sage-grouse needs and use areas are of importance to both the State and BLM. The SD Dept. of Game, Fish and Parks would need to be |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | contacted for more specifics about new information that they intend to include in the State Sage-Grouse Plan. |
| DR-MTDK-SD-13-0015-3 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 8 - Issue: Energy Development. Manage energy development to provide for domestic energy production while protecting the integrity of other resources.<br><br>COMMENT: While we support the identification of future energy development as a primary issue to be addressed in the DEIS and indeed support the protection of other resource values during energy development, we are concerned that the manner in which this issue was formulated ignores the basic tenets of FLPMA which requires public lands to be managed for multiple-use. These comments specifically reference FLPMA's direction below because other issues addressed in the DEIS appear directed solely at conserving or improving other resource values without adequate regard for multiple use activities, including the development of oil and gas resources.<br><br>For example, BLM historically cites FLPMA §102(a)(8), "...the public lands [will] be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource and archeological values..." as its authority to require mitigation of potential impacts from other activities. However, we remind BLM that FLPMA §102(a)(12) further directs that "the public lands [will] be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 U.S.C. 21a) as it pertains to the public lands." • [Emphasis added] Moreover, while FLPMA §302(b) states "the use, occupancy and development of public | The RMP/EIS evaluated a range of alternatives that provided for varying degrees of energy development along with other uses. In areas where energy development would conflict with BLM's obligations to protect other resources, BLM considered the impacts of a range of alternatives that included restricting, closing or leaving open specific areas to energy development to the extent necessary to properly balance management of all resources. The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the Proposed RMP/Final EIS. BLM carefully considered the issues brought forward during scoping the public comment period on the draft RMP/EIS and developed alternatives with full consideration of the requirements of multiple use management as described in FLPMA. While FLPMA directs the BLM to provide for multiple use, the BLM still maintains the authority to limit some uses when potential conflicts exist. |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | lands must be regulated by the Secretary through easements, permits, leases, licenses, or other instruments," • the agency must also fully acknowledge the rest of this section which directs that "these instruments include, but are not limited to, long-term leases to permit individuals to utilize public lands for habitation, cultivation, and the development of small trade or manufacturing concerns." • We ask BLM to specifically address in its "response to comments" • how it has or intends to comply with these requirements. | |
| DR-MTDK-SD-13-0015-4 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 10 - "The RMP would recognize valid existing rights." •<br><br>COMMENT: We support BLM's recognition of valid existing lease rights. According to FLPMA, the Mineral Leasing Act (MLA) and BLM's Planning 1600 Handbook, BLM does not have the authority to impose new stipulations on leases after they have been issued. Nor does BLM have authority to impose mitigation measures, such as Conditions of Approval (COA), that exceed the terms and conditions of previously issued leases. In sum, BLM cannot deprive operators of their rights to develop pre-existing leases in accordance with the terms under which they were issued. | Comment noted. |
| DR-MTDK-SD-13-0025-1 | United States Forest Service, Mary Erickson | Federal Government | In the Related Plans section on page 13, Volume 1, Chapter 1, we did not see mention of the Forest Plan for the Custer National Forest. It can be referenced as the Custer National Forest and National Grasslands Land and Resource Management Plan (1986). As you know, the Forest Plan sets forth the direction and standards for management of the National Forest System (NFS) lands administered as part of the Custer National Forest. | This plan and decision has been reviewed for consistency and is now referenced in Chapter 1 of the Final RMP/EIS. |
| DR-MTDK- | United States Forest Service, | Federal Government | There are three other decisions that more broadly affect resource management of the South Dakota portion of the | These decisions and plan related to oil and gas leasing is listed in Chapter 1 of the Final RMP/EIS. BLM would |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| SD-13-0025-3 | Mary Erickson | | Sioux Ranger District. The first is the Record of Decision (ROD) and attendant Sioux Ranger District Oil and Gas Leasing Final Environmental Impact Statement. It approves leasing for oil and gas development of the National Forest System lands of the South Dakota portion of the Sioux Ranger District. All lands in the Custer National Forest, Sioux Ranger District, Harding County are administratively available for leasing with stipulations as identified in the ROD Appendix A. This means the North and South Cave Hills and the Slim Buttes are available for lease but only with a No Surface Occupancy stipulation. The East and West Short Pines are available for lease with NSO, Timing Limitations (TL) and Controlled Surface Use (CSU) stipulations. The Final EIS is No. 20050208 (70 FR 32610) for insertion in Table 1-3.<br><br>The second is the Record of Decision and attendant Sioux Travel Management Final Environmental Impact Statement. This decision sets forth travel management for the South Dakota portion of the Sioux Ranger District, as well as the portion in southeast Montana. Regarding your transportation proposal, we would prefer your allowance under Alternatives A and B for travel of 300 feet off of designated roads for dispersed vehicle camping to be consistent with our Sioux Travel Management decision rather than the 100 feet proposed under Alternative D. The three travel management decisions for each of the Forest's ranger districts (Beartooth, Ashland, and Sioux) allows for dispersed vehicle camping, with some exceptions, up to 300 feet away from designated motorized travel routes.<br><br>The third decision is the Record of Decision and attendant Custer National Forest Weed Management | apply the stipulations discussed in the comment to federal minerals under Forest System lands in the areas mentioned as discussed on page 2 of Chapter 1. The Sioux RD Travel Management plan has been reviewed and listed in Chapter 1 of the Final RMP/EIS. The Custer National Forest Weed Management FEIS has been reviewed and considered and is included in Chapter 1. For the sake of consistency with Forest Plans, BLM has allowed a 300 foot off road travel limit to access campsites in the preferred alternative for the Final RMP. |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | FEIS (2006). This decision provides a reasonable course of action given new problems, options and opportunities to combat noxious weeds and other undesirable plants. | |
| DR-MTDK-SD-13-0027-2 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | The failure to look at the full range of reasonable alternatives is related to BLM's duty in any environmental analysis to develop, study, analyze and adopt mitigation measures to protect other resources. The ability to adopt post-leasing mitigation measures - see 43 C.F.R. § 3101.1-2 - is quite broad, as all reasonable measures not inconsistent with a given lease may be imposed by BLM. This is particularlyrue given that BLM, pursuant to FLPMA, must manage public lands in a manner that does not cause either "undue" • or "unnecessary" • degradation. 43 U.S.C. § 1732(b). Put simply, the failure of BLM to study and adopt these types of mitigation measures "“ especially when feasible and economic "“ means that the agency is proposing to allow this project to go forward with unnecessary impacts to public lands, in violation of FLPMA. | The BLM SDFO developed a reasonable range of alternatives to limit impacts to resources. Mitigations measures and the application of mitigation measures are discussed in Chapter 2 and in Appendix V-1. |
| DR-MTDK-SD-13-0030-2 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The preferred alternative does not meet the requirements of FLPMA. FLPMA requires the BLM "take action necessary to prevent unnecessary or undue degradation of the lands[.]" • 43 U.S.C. § 1732 (b). FLMPA also requires that the BLM manage lands for multiple use "without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." • 43 U.S.C. § 1702(c).<br><br>The DRMP fails to provide specific measurable terms and conditions related to livestock management sufficient to meet the requirements of FLPMA's | Over 90% of the Rangeland in the planning area are meeting standards for rangeland health and allotments in the planning areas are conservatively stocked as discussed in chapter 2 and Chapter 3. The RMP/EIS provides general goals to address livestock grazing. Site specific goals and objectives would continue to be developed during allotment management planning and the grazing lease renewal process (activity or project level planning). Because of the high variability of soils, terrain, climate development of specific goals would be difficult to apply across a large landscape as the comment suggests. Alternatives B, C, and D allows for adjustments to grazing practices or stocking rates if forage utilization exceeds 50% for allotments without specific utilization limits in the lease or Allotment |

**Table W-7**
**Comments Related to FLPMA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | unnecessary or undue degradation and multiple uses provisions. Western Watersheds Project urges the BLM to add specific measurable objectives for livestock grazing specific to riparian areas, uplands, and impacts on sensitive species habitat in order to comply with FLPMA, beginning with the five terms and conditions mentioned above. | Management Plan. The RMP/EIS would allow utilization limits to be set for individual allotments based on site specific conditions and management as discussed in Chapter 2, Summary of Alternatives Table (livestock grazing section). As shown in Appendix B, BLM would also apply guidelines for grazing management and standards for rangeland health to properly manage rangelands. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0001-1 | Avian Power Line Interaction Committee, Sherry Liguori | Association | Current Telemetry Literature Does Not Show Negative Impacts to Sage-Grouse from Power Lines<br><br>Two recent studies have used radio-telemetry to assess impacts of energy infrastructure on sage-grouse. LeBeau (2012) investigated the impacts of wind facilities and an associated transmission line in Wyoming, and Nonne et al. (2013) released a final report of a 10-year study of a transmission line in Nevada. The Nonne study is currently the only long-term study conducted that specifically evaluates potential impacts of a power line on sage-grouse.<br><br>The LeBeau study indicated that habitat quality is a significant influencer of sage-grouse occupancy, regardless of the presence of a transmission line. Sage-grouse selected for nesting habitat closer to transmission lines at Simpson Ridge, where the lines have existed for over 10 years and are within quality habitat. Also, female survival in the study area was greatest at closer proximity to the transmission lines.<br><br>In February 2013, the final progress report of a 10-year research study of sage-grouse near the Falcon- Gondor transmission line in central Nevada was released. This report noted correlations between annual plant production, related to annual climatic fluctuations, and sage-grouse survival, reproductive success, and population growth. Wildfire impacts on habitat also influenced the population. The report found "no negative effects on demographic rates (i.e., male survival and movement, female survival, prefledging chick survival, and nest survival) that could be explained by an individual's proximity to the transmission line" • . | Power transmission lines constitute a disturbance on the landscape, one that may benefit some species (as in perches for raptors and other birds) while being detrimental to others (collision, electrocution, avoidance behavior, increased predation). BLM includes measures to reduce the impact of these structures to wildlife, particularly sage-grouse, while allowing some exceptions in the cases of human safety, practicality, and cost.<br><br>While the LeBeau study did show that high quality habitat appears to outweigh the risks associated with power transmission lines for sage-grouse, the study also indicated that brood and nest survival was lower near the transmission lines than at the control site. While this is a study that should continue and be replicated in other areas to solidify results, the implications are that high quality sage-grouse habitat transversed by power transmission lines is actually a sink habitat that attracts adult females to nest but results in few successful broods and ultimately in decline of that local population. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | APLIC requests that the BLM consider these studies, which use current telemetry techniques and specifically investigate sage-grouse responses to power lines, when addressing power lines in its RMP updates. | |
| DR-MTDK-SD-13-0001-2 | Avian Power Line Interaction Committee, Sherry Liguori | Association | Common Stipulations for Power Lines May Cause Negative Impacts to Sage-grouse and Other Wildlife<br><br>Because of perceived avoidance and predation impacts to sage-grouse from power lines, electric utilities are often asked to underground power lines to reduce raptor and raven perching. Data from APLIC and other utilities indicates that these measures can have unintended negative consequences to habitat and wildlife. APLIC supports BLM alternatives to allow construction and maintenance of overhead power lines using stipulations and BMPs to minimize and/or reclaim habitat impacts versus installing underground power lines.<br><br>Installing new power lines underground or converting existing lines from overhead to underground are often raised as possible permit stipulations or mitigation options. However, underground power lines result in significant cost increases, reduced reliability, greater ground disturbance during construction and repairs, longer outage periods for customers, and may not always be feasible from an engineering and operations perspective. Underground power lines can result in impacts to other federally listed species, pose a threat of negative impacts on cultural resources, increase risks of noxious weed spread, and may have a negative impact to waterways. Underground power lines require a continuous excavation, including blasting in rocky terrain, through all habitat types. In sagebrush habitat, this would result in ground disturbance for the entire line route and associated access roads. This is in contrast to | BLM developed stipulations that would require overhead utility lines to be buried near sage-grouse and sharp-tailed grouse not only to reduce the availability of raptor perches but also to reduce the hazard of grouse flying into power lines. These stipulations were written to provide exceptions for cases where burial of lines would not be practical or safe. Prior to approval, a site specific environmental review of each project would be conducted and potential impacts to other species and resources would be considered through an interdisciplinary team process. Relatively rapid recovery of vegetation cover in disturbed areas is possible through much of the planning area compared to more arid regions with highly seasonal precipitation patterns. Comparison of disturbance impacts and recovery of soils and vegetation in Southern California to western South Dakota has limited value because of the difference in climate, soils, and geology. BLM recognizes the additional time and cost and other factors associated with burial of utility lines and would apply these stipulations to a small percent (less than 3%) of the public lands in the planning area. If burial of utility lines is likely to result in unacceptable impacts, BLM would have the discretion through project level environmental review to allow an overhead line at or near the proposed project location. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | overhead lines, which result in a disturbance only at the structure locations, and the power line's associated access. Underground lines would also require excavation for repairs or maintenance, which would result in ground disturbance occurring temporally over the life of the line, not just during initial construction. Ground disturbance during construction, repairs, and maintenance can result in large, permanent displacement of excavated soil and subsequent issues with re-establishing native vegetation and preventing the overgrowth of invasive species. A University of California study (Bumby et al. 2009) found that underground power lines have more environmental impacts than overhead power lines for all categories and most scenarios in southern California. For more detailed discussion of environmental and engineering constraints associated with underground power lines, see Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012), pages 62-63.<br><br>Because of these concerns with underground power lines, APLIC requests that the BLM consider other more effective alternatives to sage-grouse conservation, such as habitat conservation or enhancement efforts, that would also provide conservation benefits for other wildlife. | |
| DR-MTDK-SD-13-0001-3 | Avian Power Line Interaction Committee, Sherry Liguori | Association | APLIC encourages the BLM to consider mitigation banks and offsite mitigation as mechanisms to pool habitat conservation resources and target conservation efforts in highest priority areas. In the development of such mitigation banks, the potential for future power line corridors should be considered. For unknown impacts of power lines, APLIC recommends that the BLM provide opportunities and incentives to conduct additional studies using the research protocols developed by Utah | The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | Wildlife in Need in 2012 and endorsed by the Western Association of Fish and Wildlife Agencies (WAFWA). As indicated by WAFWA, such research should be acceptable as a component of a mitigation package for unknown project impacts. In addition, APLIC encourages the BLM to jointly identify potential sage-grouse incentives and partnerships with the electric utility industry. | rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain actions, such as off-site mitigation, is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate. |
| DR-MTDK-SD-13-0001-4 | Avian Power Line Interaction Committee, Sherry Liguori | Association | List of References Cited in Letter<br><br>Avian Power Line Interaction Committee (APLIC). 2006. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA. 207 pp.<br><br>_____. 2012. Reducing Avian Collisions with Power Lines: The State of the Art in 2012. Edison Electric Institute and APLIC. Washington, D.C.<br><br>Bumby, S., K. Druzhinina, R. Feraldi, and D. Werthmann. 2009. Life cycle assessment (LCA) of overhead versus underground primary power distribution systems in Southern California. Donald Bren School of Environmental Science and Management, University of California, Santa Barbara, CA. 125 pp.<br><br>LeBeau, C.W. 2012. Evaluation of Greater Sage-Grouse Reproductive Habitat and Response to Wind Energy | Thank you for providing these references. They will be considered in the revisions and incorporated into the final RMP document were applicable. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | Development in south-Central Wyoming, MS, Department of Ecosystem Science and Management, University of Wyoming. August 2012.<br><br>Nonne, D., E. Blomberg, and J. Sedinger. 2013. Dynamics of Greater Sage-grouse (Centrocercus urophasianus) populations in response to transmission lines in central Nevada. Progress Report: Year 10. February 2013. Department of Natural Resources and Environmental Sciences, University of Nevada, Reno. 75pp. | |
| DR-MTDK-SD-13-0006-6 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The plan should incorporate important, new information concerning sage-grouse and sagebrush steppe.<br><br>The following new information related to sage-grouse and sagebrush steppe was published during preparation of the Billings-PPNM DRMP/EIS and should be considered in the plan, as appropriate.<br><br>*Refer to Table W-25 of this Appendix for a list of references provided.* | Thank you for providing these references. They have been considered along with other research about sage-grouse and sagebrush habitat. |
| DR-MTDK-SD-13-0011-11 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | None of the plan alternatives include valid definition or evaluation of priority sage grouse habitats or their value to enhancing and maintaining sage grouse populations. Both ACECs and PPAs should place equal value on sage grouse, breeding, nesting, brood rearing, loafing, and foraging, wintering and habitat connectivity corridor habitats. In particular, it appears that transitional habitats such as seasonal movement corridors and regions of sub-population interactions are incorporated into general habitat areas that tend to diminish the value to sage grouse and avoid the landscape scale behavior the birds demonstrate annually. Research tends to show that | The South Dakota Field Office has adopted the sage-grouse core areas developed by South Dakota Game, Fish & Parks in the Preferred Alternative. The new core areas entirely encompass the proposed PHMAs and include additional areas that border North Dakota and a match to a greater extent the Montana and Wyoming PHMAs. It should be noted that both agencies used data from the same studies to designate sage-grouse habitat, and the information that was used by BLM was the best available at the time. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | overwintering populations do not seem to move in any quantity from historical winter ranges but it is important to understand that individuals that do demonstrate long range seasonal movements contribute immeasurably to genetic diversity and population viability characteristics. These seldom mentioned habitats are vital seasonal use areas that are not adequately recognized in the plan nor are they fairly treated in BLM's interim guidance on sage grouse conservation. Areas of habitat and population connectivity with adjoining areas in Wyoming, Montana and North Dakota are inadequately treated in all plan alternatives and require expanded research and definition before any management option is applied to the landscape. | |
| DR-MTDK-SD-13-0011-12 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | In terms of greater sage grouse recovery efforts and prevention of ESA listing, the SD IWLA recommends that;<br><br>* PPA descriptions include breeding, brood rearing, foraging, and winter range and connectivity corridors. Primary and secondary habitats must be contiguous and large enough to achieve the goal of enhancing habitat and increasing sage grouse distribution to historical levels consistent with regional stability statistics.<br><br>* Primary and secondary habitats must receive full protections for large scale disturbances such as energy developments, wind generation, and power distribution lines and corridors that research has shown to be detrimental to historical population densities and distribution levels.<br><br>* In the event that habitats cannot be fully protected from energy development due to existing rights, ROW's or leases, impacts from the activities should be | All of the NTT recommendations were evaluated in the range of alternatives and most are included in the proposed action. In a few cases, recommendations from the NTT which were not practical or applicable to SD were not included in the proposed action. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | minimized by restricting disturbance to less than 20 acres per section and parcels must be separated by not less than .8 of a mile.<br><br>*Increase the amount of protected habitat by negotiating fluid and surface mineral retirements, voluntary grazing permit retirements on temporary scales not to exceed 10 years where beneficial, mineral withdrawals, coal, uranium and surface mineral unsuitability findings, and direct mineral claim buyouts.<br><br>* Reduce overall road densities with travel planning and strictly regulate mineral and oil and gas (O&G) activities to consolidated access whenever possible to improve habitat functions and reduce conflicts with habitat connectivity and seasonal wildlife movements. See the NTT recommendations.<br><br>* Establish and maintain primary habitat (particularly special status species habitats) exclusion areas when considering new ROW permits.The BLM should consider management applications and alternatives that include strict interpretations of the NTT Report which incorporates the following recommended improvements to NTT recommendations:<br><br>*Avoid sage brush reduction treatments for the purposes of livestock or big game wildlife allocations and include practices that restore high quality habitat in areas compromised by invasive and non-native plant species.<br><br>* Implement range management practices consistent with NRCS and NTT guidelines that include avoiding new range and water developments, reduction in sage brush understory vegetation density and diversity, | |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | *Develop fire response plans that attempt to immediately extinguish fire in sage steppe habitat and design fuel treatments in sage steppe habitat in a manner that minimizes harm and disturbance to sage brush habitat and its integrity. | |
| DR-MTDK-SD-13-0011-13 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | All action alternatives should include both robust baseline monitoring data as well as protections for sage steppe habitat that include limiting development to small areas with expected low conflicts with sage grouse conservation necessities, full protections for all primary and secondary habitats that have been historically identified, expansion of ACEC's to include secondary habitats that represent movement corridors and areas of connectivity between sub-populations of birds and habitats. All alternatives must provide comprehensive and robust protections of present and future habitat recovery areas to provide the best opportunity for sage grouse population recoveries. Emphasis needs to be applied in areas where Sage Grouse have most recently disappeared such as western Fall River County where the last known sage grouse occupancy of lekking habitat occurred in 2005. | BLM is not planning on designating a sage-grouse ACEC because such designation may cause unnecessary degradation of sage-grouse habitat under some circumstances. BLM has robust protection of sage-grouse habitat in PHMAs, GHMAs, and winter range through NSO stipulations. Emphasis is placed in the strongholds of sage-grouse habitat and populations where management and change can be most readily affected. Other areas could be considered for protections or restorations at a project level or through amendment to the RMP. |
| DR-MTDK-SD-13-0011-14 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The BLM should implement thorough resource monitoring practices that facilitate timely adaptive management. Each process should be based upon a complete set of performance standards that include thresholds for application of adaptive management strategies. Suggested thresholds could include wildlife (sage grouse in particular) population density goals, reproduction/recruitment minimum indices, geographic measurements of surface disturbance, oil and gas well densities and distributions etc. In all cases, monitoring standards should be comprehensive, ongoing and | Concerning sage-grouse in particular: The BLM and the Forest Service have drafted a monitoring framework that is included in the Proposed Land Use Plan Amendment/FEIS as Appendix V-6. The appendix describes the process that the BLM and the Forest Service will use to monitor implementation and effectiveness of LUP decisions. The monitoring framework includes monitoring at various scales specific to greater sage-grouse habitat, consistent indicators to measure and metric descriptions for each of the scales, analysis and reporting methods, and the incorporation of |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | statistically capable of defining accurate trends | monitoring results into adaptive management. The need for fine and site-scale specific habitat monitoring (see Habitat Assessment Framework {HAF}) will vary by area depending on existing conditions, habitat variability, threats, and land health. To accomplish effectiveness monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes. Other monitoring efforts are done as funding is available and on a project-specific basis. |
| DR-MTDK-SD-13-0011-2 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA is concerned that the BLM has not fully considered or incorporated all the Sage Grouse Conservation Measures as detailed in the National Technical Team Report. These measures should be comprehensively applied in all alternatives and an additional alternative should be considered that provides greater protections for sage brush obligates than those described and recommended in the National Technical Team report. The plan also seems to avoid critical details and management recommendations found in both the Western Association of Fish and Wildlife Agencies (WAFWA) Greater Sage Grouse Conservation Assessment and the Greater Sage Grouse Conservation Strategies. | BLM carefully considered the recommendations in the National Technical Team report, and other recommendations including WAFWA and other Sage Grouse Conservation Strategies when the alternatives were developed. These recommendations were included in the range of alternatives. Detailed conservation measures are also included in the Final RMP/EIS as described in Appendix V-1 to address specific concerns about various activities on sage grouse or sage-grouse habitat. |
| DR-MTDK-SD-13-0011-25 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Greater Sage-Grouse PPAs would be managed as No Surface Occupancy and Use (83,744 (Acreage difference in Table 2-1, see above) surface and 253,357 oil and gas subsurface minerals acres as shown in Map 2-4). These | The South Dakota BLM adopted the sage-grouse core areas developed by the State/Game, Fish & Parks in the preferred alternative (Alternative D). In the Proposed RMP, the BLM has adopted Priority Habitat |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | areas would be open to oil and gas leasing with a no surface occupancy stipulation. All sage-grouse habitat that is not part of a PPA would be managed as General Habitat as noted in Map 2-4.<br><br>SD IWLA disagrees with the preferred alternative: Identification of important sage-grouse landscapes within SD were comprehensive as mapped in the document and therefore we are perplexed that only a portion of the identified preliminary PPAs were included in the preferred alternative. We understand, through WAFWA and other sources that a 2008 MOU between BLM and WAFWA members stressed the importance of collaboration and science-based decisions for sage-grouse conservation. To deliberately exclude a PPA from the preferred alternative infers that the BLM acknowledges important sage-grouse habitat exists, but chooses not to provide increased protection for their conservation. Inadequate regulatory mechanisms were identified as a listing factor for the warranted but precluded listing decision by the USFWS and therefore, IWLA recommends that the BLM include the full range of PPA's in the preferred alternative to avoid conflicts with previous ESA determinations involving the greater Sage Grouse | Management Areas and General Habitat Management Areas |
| DR-MTDK-SD-13-0011-26 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Retain public ownership of priority sage-grouse habitat. BLM would consider exceptions where there is mixed ownership, and land exchanges would allow for additional or more contiguous federal ownership patterns within the priority sage-grouse habitat area. Under priority sage-grouse habitat areas with minority federal ownership, BLM would develop an additional, effective mitigation agreement for any disposal of federal land. As a final preservation measure, consideration would be given to pursuing a permanent conservation easement. | The following is text from Chapter 3 of the RMP:<br><br>"Land exchange is the BLM's preferred method of land ownership adjustment to bring lands and associated interests with high public resource values into public ownership; consolidate land ownership and mineral estate patterns to achieve more efficient management of resources and BLM programs; and dispose of public land parcels identified through the land use planning process." |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | SD IWLA disagrees with this statement; Care in disposal needs to be exercised in these areas. NGO's and other conservation minded organizations are prepared to negotiate perpetual easements to protect and conserve the sage steppe ecosystem in South Dakota and therefore, SD IWLA encourages the BLM to refrain from considering disposal exceptions until all avenues to protect the integrity of the sage brush landscape are exhausted. Even then, acquisitions and exchanges should result in not only greater contiguous ownership patterns but also greater habitat quantity and quality. The BLM and other Federal and State Agencies need to work on the development of conservation easement programs that act as a habitat conservation alternative to acquisition. | "The Federal Land Transaction Facilitation Act of 2000 (FLTFA) provides a means of banking funds from land sales and aids in the acquisition of lands. The FLTFA of 2000 does not apply to land sales in the SDFO because the SDFO is not part of the 11 western states authorized in the Act. In addition, the FLTFA is currently expired. Sales of SDFO lands could be greatly increased and help consolidation of its scattered land pattern if the BLM had some authority similar to the FLTFA."<br><br>In the Draft EIS, BLM identified most of the area in PPAs as a retention area. See Map 2-2 in the Draft EIS. BLM does not propose to dispose of land with high resource values. However, prior to disposal of any land, BLM would conduct a project-level environmental review and any areas with quality habitat would be retained. In terms of acquisitions, please refer to Chapter 2, Table 2-2 Lands and Special Status Species sections, and Appendix I in the Draft EIS. |
| DR-MTDK-SD-13-0011-37 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Oil &Gas<br><br>Greater Sage-Grouse PPAs would include the same areas as Alternative B as shown in Map 2-4 (83,744 surface acres and 253,357 subsurface acres). Refer to Map 2-28 for oil and gas restrictions.<br><br>SD IWLA expressly disagrees with this preferred alternative. See comments on page 18 of this document relating to this topic. Excluding full preliminary PPA's from the preferred alternatives represents an inadequate regulatory mechanism affecting the status and trends of sage grouse and their life requirements. SD IWLA suggests that proposals such as this fully defeat the tenets contained in the NTT Report and disregard the | The South Dakota BLM adopted the sage-grouse core areas developed by the State Game, Fish & Parks as the PHMA for Alternative D. The PHMA encompass the PPA proposed in Alternative C in the Draft RMP/EIS and all together includes more acres than any of the PPAs developed for the Draft RMP/EIS. |

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| | | | national effort to recover sage grouse and sage steppe habitats to viability. | |
| DR-MTDK-SD-13-0015-19 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 10 - "The BLM will utilize the Western Association of Fish and Wildlife Agencies (WAFWA) Conservation Assessment of Greater Sage-Grouse and Sagebrush Habitats (Connelly, et al. 2004), and any other appropriate resources, to identify sage-grouse habitat requirements and best management practices (BMPs)."<br><br>• COMMENT: The above statement is unacceptably vague. The BLM fails to clarify the determining factors in identifying resources as being "appropriate" • per the statement above? | Page 10 of Chapter 1 has been revised to state: "The BLM will utilize the Western Association of Fish and Wildlife Agencies (WAFWA) Conservation Assessment of Greater Sage-Grouse and Sagebrush Habitats (Connelly, et al. 2004), and any other appropriate resources (e.g., peer-reviewed scientific literature, internal documents or guidance, other state or federal agencies, expert opinion, etc), to identify sage-grouse habitat requirements and best management practices (BMPs)." This is in order to clarify some of the additional resources used to identify sage-grouse habitat, requirements, and management practices. |
| DR-MTDK-SD-13-0015-21 | Public Lands Advocacy, Claire Moseley | Consumer Group | This goal needs to provide a concise definition of what constitutes "viable" • sage-grouse populations. Presumably, all existing populations are viable. If a population is determined to be nonviable, would BLM endeavor to seek to maintain such habitat? | Not all existing populations are viable. An example specific to sage-grouse is that of the species in Alberta, Canada, where males counted on leks have dropped below a dozen total across all leks. Translocations of sage-grouse from Montana to Alberta have taken place to buy the population more time while habitat improvements are made. The population is not viable because the breeding individuals are not able to produce enough offspring to increase or maintain their numbers. Sufficient genetic diversity to prevent inbreeding is also an issue in small and isolated populations, especially for species that have a breeding system in which only a few dominant males breed with the majority of females. South Dakota does have a viable population of sage-grouse that could increase in numbers of its own accord provided conditions (habitat quality, lack of West Nile virus, seasonal weather events/patterns, and predation) are favorable enough that the numbers of individuals can fluctuate year to year without ever dropping too low for recovery. If, for example, an event such as a West Nile |

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| | | | | virus outbreak occurred that rendered sage-grouse in South Dakota an unviable population in spite of availability of suitable habitat, then BLM would likely continue to manage the habitat for sage-grouse. If habitat is not limiting, then sage-grouse from neighboring populations could re-establish, either naturally or through translocations. |
| DR-MTDK-SD-13-0015-22 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 45 - Alternative D -"NSO stipulations would include areas within 0.5 miles of sage-grouse leks and associated habitat (outside of PPAs)."<br><br>COMMENT: The statement above is inconsistent with the summary of Alternatives. Table 2.2 states that Alternative D has a NSO stipulation within 1.0 mile of sage-grouse leks in general habitat (outside of PPAs). Is it 1 or 0.5 miles? In either case, how was the NSO stipulation derived? NSO buffers around leks and nesting/brood-rearing habitat include 0.5, 1, 2, 3, and 4 miles with various alternatives. It would appear that these buffers are arbitrary and not based on scientific data and criteria despite the following statement on Page 595 (Assumptions): "Current accepted science will be used to assist in making sound decisions regarding surface-disturbing, disruptive, or other actions throughout the planning area" • . The scientific basis for various NSO buffers around leks must be presented and defended in the RMP. | Alternative D in the Proposed RMP provides for a 6/10 of mile NSO around leks in general habitat (outside of PPAs). The inconsistency that was noted was a typographical error and has been corrected. The basis for the buffers is the result of review of various publications and research as noted in the citations and bibliography. |
| DR-MTDK-SD-13-0015-23 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 358 - "To adequately protect sage-grouse in South Dakota, high use areas will need to be defined and protected." •<br><br>COMMENT: What are high-use areas? How do they differ from leks, nesting, brood-rearing habitat, and wintering areas? This statement seems to indicate that | Wording will be revised to clarify the meaning of the sentences on page 358. High-use areas do not differ from leks, nesting, brood-rearing, and wintering areas.<br><br>The statement regarding declines of sage-grouse is a deceiving one and will be revised. Sage-grouse populations are notoriously erratic when the year-to-year |

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| | | | additional information is needed to first define high-use areas in order to determine how best to adequately protect sage-grouse in South Dakota.<br><br>Page 358 - "Sage-grouse have been declining at on estimated rate of 2% per year in the United States. This trend is mainly the same in South Dakota, with the exception of an upward trend in lek attendance in 2006 and 2007." •<br><br>COMMENT: The source of this information needs to be cited and its applicability to South Dakota must be clearly documented. South Dakota data on lek attendance needs to be available as an appendix to this RMP/EIS to allow for independent analysis. | data are compared for a short span of years. A trend line over multiple years is more telling of actual status of a population than looking at the peaks and valleys of raw data. The number of sage-grouse counted in South Dakota did increase in 2006 and 2007, but this is hardly a trend when viewed in light of the past several decades.<br><br>With regards to inclusion of lek attendance numbers, this is data that can be requested from SD Game, Fish, & Parks. |
| DR-MTDK-SD-13-0015-25 | Public Lands Advocacy, Claire Moseley | Consumer Group | It is unclear whether these stipulations and restrictions will be applied to all known leks or to all known active leks? Please clarify. Additionally, given the centrality of leks to the BLM's proposed management actions, it is necessary for the occurrence of existing (or active if that is the determining factor) leks to be depicted somewhere in the RMP/EIS map set so that an understanding can be developed geographically of how these 1, 2, 3 and 4 mile-buffers, respectively would impact surface occupancy, controlled surface use, and what areas would be affected by timing restrictions. It is also necessary for BLM to clearly explain the efficacy of such buffers in relation to the activities it is restricting. | Stipulations and restrictions apply to active leks. Locations of known leks will not be depicted or released to the public for the protection of sage-grouse. The PHMA identified in the Draft RMP/EIS encompasses a number of active leks, and it is the responsibility of the Resources staff, including the Wildlife Biologist, to communicate with potential developers as to where buffers lay on a case by case basis. The efficacy of the buffers is in protecting the respective species or resource from disturbance or damage. This fact is generally expressed in the descriptions of the stipulations with relation to the species or resource to which they apply. |
| DR-MTDK-SD-13-0015-27 | Public Lands Advocacy, Claire Moseley | Consumer Group | Oil and gas and renewable energy development are sources of surface disturbance and disruption identified in the planning area under all alternatives, oil and gas development has been identified as a cause of declining sage-grouse populations (Doherty, et al. 2008, Walker, et al. 2007, Naugle, et al. 2009, Harju 2009)." • | While it may be the case that newer practices and technologies reduce the overall effect of oil and gas development on sage-grouse, there is an extensive body of literature indicating that anthropogenic developments of many sorts, and especially oil and gas development have negatively affected and continue to affect sage- |

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| | | | COMMENT: As stated previously in these comments, this information is outdated and is related to studies conducted in areas which contain extremely intense development before mitigation measures were implemented. Moreover, it has since been documented that even in these intensely developed areas where mitigation was not employed, the sage grouse has not declined as projected in Holloran 2005. We also point out that the Ramey et al (2011) report points out that "Current stipulations and regulations for oil and gas development in sage-grouse habitat are largely based on studies from the Jonah Gas Field and Pinedale Anticline. These and other intensive developments were permitted decades ago, using older, more invasive technologies and methods. The density of wells is high, due to the previous practice of drilling many vertical wells to tap the resource (before the use of directional and horizontal drilling of multiple wells from a single surface location became widespread), and prior to concerns over sage-grouse conservation. These fields and their effect on sage-grouse are not necessarily representative of sage-grouse responses to less-intensive energy development. Recent environmental regulations and newer technologies have lessened effects to sage-grouse." • | grouse. Future studies may show negligible effects of recent oil and gas development on sage-grouse, and if that is the case, amendments can be made. However, until the time that there is substantial evidence showing that sage-grouse are no longer in decline due to development, regulations must be in place to protect the species and prevent its listing as an ESA species. |
| DR-MTDK-SD-13-0015-5 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 10 - "The National Sage-Grouse Habitat Conservation Strategy (BLM 2004) requires that impacts to sagebrush habitat and sagebrush-dependent wildlife species (including sage-grouse) be analyzed and considered in BLM land use planning efforts for BLM-administered public lands with sage-grouse/sagebrush habitats. Greater Sage-Grouse were recently found to be warranted but precluded from listing as an endangered species by the US Fish and Wildlife Service." | The National Technical Team was formed as an independent, science-based team to ensure that the best information about how to manage the Greater Sage-Grouse was reviewed, evaluated, and provided to the BLM and Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable GRSG populations. The NTT report was intended to be used at a programmatic scale and may not reflect local conditions. The NTT report |

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| | | | • Page 10 -"The BLM will utilize the Western Association of Fish and Wildlife Agencies (WAFWA) Conservation Assessment of Greater Sage-Grouse and Sagebrush Habitats (Connelly, et al. 2004), and any other appropriate resources, to identify sage-grouse habitat requirements and best management practices (BMPs)." •<br><br>COMMENT: As referenced later in these comments the proposed management of Greater Sage grouse is based upon recommendations contained in the National Technical Team Report, A Report on National Greater Sage-Grouse Conservation Measures, which it must be noted is not supported by the WAFWA as appropriate, is severely flawed for a host of reasons, not the least of which is that much of it is based upon intensive gas field development that was purposely not subject to the rigorous mitigation measures currently utilized to protect the Greater Sage-grouse in order to obtain baseline data upon which to develop effective protection measures. | was a synthesis of peer-reviewed literature, citing 122 references including published papers from formal scientific literature such as Journal of Wildlife Management, Conservation Biology, Biological Conservation, Wildlife Biology, BioScience and others, as well as graduate theses and dissertations, conservation strategies, USFWS 2010 finding, and others representing the best available science.<br>The report provides research showing that sage-grouse respond negatively to anthropogenic development in sagebrush habitats. Oil and gas development have been shown again and again to negatively affect sage-grouse. In addition to the NTT Report guidance, the IDT Team has ensured that a sufficient amount of supporting peer-reviewed scientific literature is cited in the Final RMP/EIS to support analytical conclusions. |
| DR-MTDK-SD-13-0023-2 | South Dakota Stockgrowers Association, Silvia Christen | Association | We urge the BLM to provide or investigate a wider range of alternatives for the Greater Sage Grouse. The proposed RMP is based solely on the 2011 National Technical Team (NTT) report that is currently being disputed for its findings that lead toward further land-use restrictions and its lack of supporting data based on scientifically acceptable methods and data. Further, we urge the BLM to strongly consider use of the BLM Manual 6840 as an alternative and effective management program. The BLM's blanket acceptance of the NTT report does not take into consideration the unique characteristics of the land in the Dakotas which is on the fringe of the GSG area, and is considered poor GSG habitat. BLM should discuss and present alternative management tools for the GSG. | One of the factors the USFWS determined as contributing to sage-grouse being warranted for listing was lack of appropriate regulatory mechanisms to protect sage-grouse. Therefore, in light of the pending listing decision for sage-grouse, the only feasible alternatives must include sufficient protections as to ensure that sage-grouse will not continue to decline. In addition to guidance from the NTT, BLM incorporated findings from scientific literature and, in some cases, expert opinion of those with knowledge specific to the South Dakota planning area. The South Dakota BLM recognizes that sage-grouse and sagebrush habitat in the planning area does not resemble sage-grouse and sagebrush in the Great Basin and has tailored its management of sagebrush and sage-grouse accordingly. |

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| | | | The GSG Initiative has the potential to greatly impact the current grazing systems on the Dakotas BLM acres and we ask BLM to move cautiously on this program. The Initiative has the potential to overshadow and lessen the priority of grazing as a multiple-use of the Dakotas BLM land. BLM is urged to consider the importance of viable, sustainable grazing in the economic and social wellbeing of the State of South Dakota and the counties that will be impacted by this RMP. | Additionally, the Sage Grouse Initiative is a program run by USDA's Natural Resource Conservation Service (NRCS) and is not a part of BLM. BLM is a multiple use agency and considers grazing an important resource use. |
| DR-MTDK-SD-13-0027-1 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | The sage grouse population inhabiting North and South Dakota declined continuously from a high of 4,000 strutting males in 1969 to 939 males in 2007 (Garton et al. 2011). Projecting these trends into the future, these researchers predicted 222 strutting males in the Dakotas by 2037 and 23 males by 2107 if current trends continue. This population level represents functional extirpation. In 2007, 21 leks were counted with 488 males recorded, while in 2008, 339 males were counted on 22 leks (SDGFP 2008). Garton et al. (2011) reported a 67% chance of the population dropping below a Ne of 50 birds within the next century (id.). According to the federal Conservation Objectives Team report, "Overall, this population is small and at high risk." • Given the relatively small size, some degree of isolation from other populations (which is likely to increase if projected declines in the Powder River Basin, after Taylor et al. 2012 and 2013, occur), and the peripheral nature of the population which increases likelihood of extirpation, the BLM faces a challenging management environment in which to maintain sage grouse populations in the SDRMP planning area. | BLM recognizes the decline in sage-grouse in the planning area and has taken appropriate steps within its authority to limit degradation of habitat and limit disturbance to sage-grouse. For the reasons expressed in the comment, the Proposed SD RMP and Final EIS provides an in depth analysis of sage-grouse and a suite of various management action to address concerns about sage grouse. |
| DR-MTDK- | WildEarth Guardians, Erik | Environmental Protection | For weed treatments near sage grouse leks, all newly developed alternatives allow spot treatments near leks | Major weed treatments near sage-grouse nesting and brood rearing habitat are unlikely as noxious weeds are |

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| SD-13-0027-12 | Molvar | Association | during the breeding and nesting season; only Alternative A prohibits herbicide treatments near leks, although the 2-mile buffer is too small. DEIS at 54. There should be a seasonal moratorium on the spraying of both insecticides and herbicides within 5.3 miles of sage grouse leks during the breeding and nesting season, to prevent unintended poisoning of sage grouse using these areas for nesting and brood-rearing. This more responsible approach to hazardous substance management is outside the current range of alternatives, but should be considered in detail and then implemented in the final RMP. | limited in these areas. Under the proposed action, only herbicide spot treatments would be allowed within 3 miles of sage-grouse leks. If large scale broadcast treatments of weeds or insects are needed, these actions would be evaluated at the project level for impacts to sage-grouse and such actions would be subject to additional environmental review at the project level including coordination with stakeholders and other local, state, and federal agencies. |
| DR-MTDK-SD-13-0027-13 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We would like to make clear our expectation that BLM manage mineral development on BLM minerals at a level consistent with the maintenance and recovery of sage grouse populations, irrespective of whether the surface estate is in BLM or private ownership. BLM has 100% control over the pattern of oil and gas development on private surface and BLM minerals, and it is reasonable to expect the federal government to exercise its management authority over the development of federal minerals to maximize the survival of sage grouse populations. Anything less will be interpreted as inadequate and ineffective regulatory mechanisms in the context of the Endangered Species Act, resulting in a trend toward the need to list the sage grouse as threatened or endangered in violation of BLM Sensitive Species policy. We would interpret this outcome as resulting in both unnecessary and undue degradation of sage grouse habitats and populations pursuant to FLPMA. | The BLM does not have complete control over the pattern of oil and gas development in South Dakota; BLM only has control of oil and gas development on BLM administered surface estate and federal mineral estate under BLM's jurisdiction. Many of the private lands in South Dakota lie over private minerals. BLM has no authority in this case.<br><br>BLM does have authority to manage oil and gas development in cases of split estate where private land lies over federal minerals or BLM administered surface lies over Federal minerals and a reasonable range of alternatives have been analyzed and various restrictions and other management actions have been established to protect sage grouse and its habitat. Actions to protect sage grouse and sage grouse habitat are discussed in the Summary Of Alternatives table in Chapter 2 (Special Status Species Section) and in Appendix V-1 of the RMP/EIS. |
| DR-MTDK-SD-13- | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Collisions with fences pose a potentially major cause of mortality for sage grouse. Stevens et al. (2013) found that South Dakota had one of the highest probabilities of | BLM and NRCS place fence reflectors on fences in near proximity to leks. BLM is developing a method to identify higher risk areas for grouse and fence collisions |

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| 0027-17 | | | fence collisions, and fences on flat areas near leks were a particularly high risk for causing sage grouse fatalities. BLM cites Stevens (2011) with statistics that indicate that barbed "“wire fences in Idaho resulted in almost 27 bird collisions per mile per season, which was reduced to a little over 7 collisions per mile when reflectors were added to the fences. DEIS at 632. Of course, eliminating fences has the effect of reducing collisions to zero. With this in mind, fences in sage grouse Preliminary and General Habitats should be inventoried to identify the minimum necessary fencing required for livestock management. Fences determined to be unnecessary should be removed, especially in flat areas near leks, and remaining fences should be outfitted with reflectors or other visibility devices to reduce sage grouse collisions. | and will mark these fences and to the extent practical and avoid new fence construction in these types of areas. There are a number of places that refer to placing markers, and modifying fences, to reduce sage grouse mortality including chapter 2 Table 2-2, special status section and grazing sections and Appendix V-1. |
| DR-MTDK-SD-13-0027-18 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Livestock grazing can influence sage grouse habitat suitability, particularly overgrazing which can reduce understory grasses below critical thresholds and alter the density of sagebrush. In their study on sage grouse in eastern Oregon, Call and Maser (1985) made the following basic assumption: "Where there are conflicts between sage grouse and livestock on public lands, it may be essential to give priority to sage grouse if they are to continue to exist on these areas" • (p. 3). According to Autenreith et al. (1982), heavy livestock grazing during the sage grouse nesting or brood rearing seasons is deleterious. According to Gregg et al. (1994), "Land management practices that decrease tall grass and medium height shrub cover at potential nest sites may be detrimental to sage grouse populations because of increased nest predation....Grazing of tall grasses to to <18 cm would decrease their value for nest concealment. BLM should include residual grass requirements inside all sage grouse habitats to be applied in as amendments to Allotment Management Plans. BLM should include | The RMP provides a very conservative stocking rate allocation based on the Missouri River Basin studies which provide an allocation of approximately 25% of forage to livestock and allows the rest to be left for watershed protection and wildlife needs. (See chapter 3.) The RMP also provides a 50% utilization limit but allows for higher or lower levels on individual allotments through Allotment Management Planning. (See chapter 2.) The RMP does not utilize stubble height requirements for grazing in sage-grouse areas because some plant communities and ecological sites do not have the capability to produce an 18 cm grass height under ungrazed conditions—regardless of climatic conditions. At the project level all allotments in sage-grouse habitat will be evaluated through Allotment Management Planning and continuing rangeland health assessments for site specific practices included providing residual nesting cover to limit grazing impacts to sage-grouse. Heavy livestock grazing is not proposed in sage-grouse habitat. |

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| | | | residual grass requirements inside all sage grouse habitats to be applied in as amendments to Allotment Management Plans. | |
| DR-MTDK-SD-13-0027-19 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We refer the South Dakota BLM to the provisions in the Bighorn Basin RMP Sage Grouse Supplement (BLM 2013b:2-33) that should be incorporated into the South Dakota RMP; these standards should be supplemented with measurable benchmarks to ensure strong rangeland health. | The Bighorn Basisn RMP was reviewed when the SD RMP was developed. All of these actions and practices are addressed in the RMP/EIS in Chapter 2 and in Appendix V-1. |
| DR-MTDK-SD-13-0027-21 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We are concerned that many, if not most, of these "habitat improvement" • projects are actually harming sage grouse habitat in the long term and that the remainder will cause short-term impacts to sage grouse populations that contribute to the multiple serious threats to their existence. The scientific basis for many such projects (which include prescribed burns and mechanical or herbicidal thinning or removal of sagebrush) is extremely shaky, and given the lack of familiarity of the project proponents with basic sage grouse habitat requirements, such projects may unintentionally cause additional damage to sage grouse habitats. The impacts (positive and/or negative) of such projects have not been rigorously tested, and thus their results for improving (or harming) sagebrush habitats remain open to speculation.<br><br>BLM should rigorously evaluate all sagebrush habitat treatment projects to determine how exactly they will impact sage grouse populations prior to counting such projects as assets toward sage grouse recovery or threats to sage grouse persistence. The parameters of these projects should be compared to scientifically established habitat requirements for the grouse: for example, is thinning being implemented in sagebrush stands that exceed the canopy cover preferences of grouse for that | Projects are evaluated on a case-by-case basis. Using fire to treat sagebrush would only occur if a definite need were determined to exist (Special Status Species, management action 28, Fire Management and Ecology, management action 2), and the South Dakota Field Office does not otherwise thin or treat sagebrush in a manner which reduces its amount. The Resource Specialists work together to ensure that projects or treatments do not negatively affect sage-grouse or other species to the extent practicable. |

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| | | | type of habitat, or is canopy cover already optimal or too sparse for sage grouse habitat needs? | |
| DR-MTDK-SD-13-0027-22 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We recommend that noise limits be imposed in the RMP, allowing no greater than 32 dBA noise levels in sage grouse nesting and breeding habitats. | In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM would apply the lek buffer-distances identified in the USGS Report "Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review" (Open File Report 2014-1239) in accordance with Appendix V-3 to address several impacting factors, including noise and disruptive activities. |
| DR-MTDK-SD-13-0027-23 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Unfortunately, alternatives considered for the SDRMP have lek buffers of 0.25 mile to 1.0 mile; this corresponds to a 4 to 10% probability of lek persistence. By comparison, the NTT report recommends a 4-mile lek buffer for siting industrial development in sage-grouse habitat (SGNTT 2011), a prescription in greater accord with the science. These lek buffers should be applied to both PPAs and General Habitat as an added protective measure against the possibility that prior existing leases will experience development inside PPAs.<br><br>Under Alternative A, a ¼ mile buffer would be provided for leks. DEIS at 636. We assume this applies to PPAs and General Habitat equally, but the EIS is ambiguous on this point. Please clarify. BLM states this would "protect nesting habitat within that ¼ mile" • (DEIS at 636), and "eliminate short-term direct impacts and long-term indirect impacts associated with oil and gas leasing in small areas around sage-grouse leks"...." •<br><br>Under Alternative B, outside PPA areas, ½ mile NSO stipulations "would protect the nesting habitat within | Based on coordination with BLM cooperating agencies and public comments, the Proposed RMP has identified lek buffer-distances from the USGS Report "Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review" (Open File Report 2014-1239) in accordance with Appendix V-3. Additionally, PHMAs are identified as exclusion areas for renewable energy ROWs, avoidance areas for linear ROWs (high voltage powerlines as well as minor ROWs), and NSO without waivers or modifications for all PHMAs. For GHMAs, renewable energy areas and high voltage transmission and large pipelines are allocated as avoidance areas, minor ROW areas are allocated as open areas, and fluid mineral leasing is open with moderate constraints. |

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| | | | that area." • DEIS at 647. These are false statements based on the state of scientific knowledge related to impacts to sage grouse from oil and gas development, because the impacts of drilling extend 3 miles from the wellsite, and impacts from production-related activities extend 1.9 miles from the wellsite (Holloran 2005). BLM notes negative impacts to sage grouse lek populations from wells sited as far as 7.6 miles from the lek (Tack 2009, DEIS at 660). Some researchers have found the area of effect to be even greater. Taylor et al. (2012) concluded that "For oil and gas development, the signal is strongest within a 12.4-mi (20-km) radius of a lek, and it is much stronger at this radius than at any smaller radii." • Thus, siting a well within ¼ mile of a lek would result in disturbance impacts that extend throughout the entire quarter-mile buffer, and birds nesting within this buffer would be negatively impacted, with the same result for a ½ mile buffer. BLM's own analysis from literature review subsequently supports our contention. DEIS at 637. The impacts analysis should be amended to correct this erroneous conclusion. We do support BLM's recognition that Alternative A "could result in extirpation of sage-grouse" • from parts of the planning area. DEIS at 637.<br><br>Under Alternatives C and D, NSO stipulations would apply to land within one mile of active sage grouse leks. DEIS at 42, 668. This represents an inadequate level of protection. Holloran (2005) documented that the existence of a producing well within 1.2 mile of an active sage grouse lek led to lek population declines. South Dakota data indicates that 97% of sage grouse nested within 4.35 miles of leks, while 32% nested farther than 1.86 miles from the lek site. Sensu DEIS at 658. Even Harju et al. (2009:443) found that "a general | |

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| | | | pattern was apparent whereby infrastructure within smaller radii (=1.6"“2 km) [1 to 1.25 miles] encircling leks was associated with 35"“76% fewer sage-grouse (depending on radii and study area) compared to leks at which no infrastructure occurred within these radii." •<br><br>BLM recognizes this in its analysis under the Preferred Alternative, stating this one-mile buffer "would not address long-term indirect impacts to sage-grouse from activities that would occur outside the timing restriction since local studies showed 62 percent of the time they were within 12.98 miles of lek sites (Kaczor 2008)." • DEIS at 668.BLM correctly cites to science indicating that lek buffers of 0.25 mile, 0.5 mile, 0.6 mile, and 1.0 mile result in predicted lek persistence of 5%, 11%, 14%, and 30% respectively, versus 85% for leks in the absence of development. DEIS at 649. WGFD estimates are even lower, at 4, 5, 6, and 10%, respectively (Christiansen and Bohne 2008). Even a 70% probability of lek abandonment is an unacceptably high risk of failure, and BLM should apply NSO buffers of not less than two miles in combination with Timing Stipulations restricting drilling during the period of habitat occupancy to apply as Conditions of Approval (COAs) to existing leases that pre-date the RMP revision. BLM points out that existing leases would undermine sage grouse protections in areas of high and moderate mineral potential. DEIS at 657. This effect would be lessened with the applications of COAs as described in these comments. | |
| DR-MTDK-SD-13-0027-24 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Alternative C includes a 3% disturbance limit, but appears to average this across the entire PPA area; in order to be scientifically sound the 3% disturbance calculation should be made on a square mile section-by-section basis. The Preferred Alternative apparently | The limit of 3% disturbance was set as an objective in Alternative C. The preferred alternative has an objective that states " Objective: Manage Greater Sage-Grouse PPAs so that discrete anthropogenic (human-caused) disturbances do not adversely impact sage-grouse |

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| | | | proposes no cap on surface disturbance, which renders it an inadequate regulatory mechanism in the context of Endangered Species considerations. | distribution or abundance." In the Proposed RMP/Final EIS, the BLM has identified a 3% disturbance cap as well as guidance on how the cap would implemented, calculated, and monitored. See Appendix V-4 in the Final EIS. |
| DR-MTDK-SD-13-0027-25 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We are concerned that mining for uranium, rare earth metals, bentonite, or other minerals would destroy sage grouse habitat and defeat the purpose of establishing PPAs. BLM acknowledges this as a likelihood. DEIS at 669. However, under all other alternatives, sage grouse PPAs remain open to these types of mineral development. DEIS at 58. This latter approach would destroy the very PPA habitats which oil and gas stipulations seek to protect under the same alternatives, a disastrous outcome for sage grouse. The final RMP needs to propose withdrawal of PPA lands from mineral entry, as the 1872 Mining Law offers BLM very little discretion in the management of mineral extraction once valid claims are being exploited. | This was evaluated in Alternative C. Most of the high potential locatable minerals are already claimed; therefore, a withdrawal would have little effect in protecting sage-grouse. |
| DR-MTDK-SD-13-0027-3 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | In particular, federal agencies must explore alternatives to proposed actions that will avoid or minimize adverse effects on the environment, 40 C.F.R § 1500.2(3), alternative kinds of mitigation measures, 40 C.F.R. § 1508.25(c)(3), alternatives that would help address unresolved conflicts over the use of available resources (e.g. roadless areas and/or potential wilderness), 40 C.F.R. § 1501.2(c), and other reasonable courses of action, 40 C.F.R. § 1508.25(c)(2). The requirement to consider such less damaging alternatives helps agencies meet NEPA's primary purpose of promoting "efforts which will prevent or eliminate damage to the environment and biosphere..." • 42 U.S.C. § 4321. These requirements are affirmed in BLM policy: "BLM officials may not so narrow the scope of a | BLM considered a reasonable range of alternatives as required by NEPA with full consideration of the multiple use mandates and the NEPA requirements described by the comment. BLM did not start the planning process with a particular management approach in mind, but developed a range of alternatives with individual alternatives that addressed certain resources or uses more than others and then selected a preferred alternative based on analysis of all alternatives in concert with the RMP Cooperating Agencies.<br><br>The Proposed RMP in the final EIS includes all the key elements recommended by the NTT. A few recommendations were not included in the proposed action based on practicality of enforcement within South |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

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| | | | planning/NEPA document as to exclude a reasonable range of alternatives to the proposed action..." • USDI Instruction Memorandum No. 2001-075. The IBLA has established that the elimination of reasonable alternatives without sufficient analysis does not satisfy NEPA, and noted that "While we could speculate about the BLM's rationale for dismissing"... alternatives, we should not be required to fill in the blanks for BLM. The record should speak for itself." • Biodiversity Associates, IBLA 2001-166, at 7 (2001). Such objective evaluation is gravely compromised when agency officials bind themselves to a particular outcome or foreclose certain alternatives at the outset. Importantly, BLM's decision to approve a high-impact project in sensitive and undeveloped lands when lower-impact alternatives and mitigation measures were readily available has resulted in a project that wreaks unnecessary impacts on the public lands.<br><br>BLM must consider implementing key sage grouse protections recommended by USFWS and the BLM's own National Technical Team (e.g., a 4-mile no surface disturbance buffer for active leks within Core Areas). And the BLM must consider measures that require a prohibition on surface disposal of coalbed methane wastewater. | Dakota's scattered landownership pattern.<br><br>South Dakota has extremely little coalbed methane development potential. BLM has added to the management common to all section that Wastewater from coalbed methane development would not be disposed of on ground surface unless it meets minimum state water quality requirements. |
| DR-MTDK-SD-13-0027-4 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | In the South Dakota RMP DEIS, BLM must take the legally required "˜hard look' at the efficacy of sage grouse conservation measures, particularly those applied within Core Areas. BLM also must take the legally required "˜hard look' at direct or cumulative impacts to sage grouse wintering habitat under the various alternatives; since the impact of development approved under the RMP on breeding and nesting sage grouse matters little if sage grouse populations do not survive | The RMP does identify winter habitat areas for sage-grouse. Occurrence of sagebrush, which is critical to sage-grouse overwinter survival, was used to identify core areas. As such, the best of these sagebrush areas are protected by stipulations applied in PHMAs and GHMAs, and the core areas now being developed by the state. |

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| | | | the winter. In order to achieve this, wintering habitats must be identified as part of the NEPA process. | |
| DR-MTDK-SD-13-0027-6 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | According to the original mining regulations, "Unnecessary or undue degradation means impacts greater than those that would normally be expected from an activity being accomplished in compliance with current standards and regulations and based on sound practices, including use of the best reasonably available technology." • 43 C.F.R. § 3802.0-5(l) (emphasis added). In the South Dakota RMP EIS, BLM has failed to uniformly apply in its Preferred Alternative the recommended sage grouse protections presented to it by its own experts (the BLM National Technical Team), and as a result development approved under the alternatives analyzed will result in both unnecessary and undue degradation of sage grouse Core Area habitats and result in sage grouse population declines in these Core Areas, undermining the effectiveness of the Core Area strategy as an Effective Conservation Effort in the context of the decision whether to list the sage grouse under the Endangered Species Act. | The BLM has applied recommendations provided by the NTT in its range of alternatives, and focuses the greatest protections for sage-grouse in PHMAs that contain the majority of good sage-grouse habitat. |
| DR-MTDK-SD-13-0027-7 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | According to BLM IM 2012-44, "The conservation measures developed by the NTT and contained in Attachment 1 must be considered and analyzed, as appropriate, through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-Grouse habitat." • This must be done fully in the South Dakota RMP EIS. IM 2012-44 does not provide an option not to analyze these measures in at least one alternative unless a clear finding is provided that the measure is not appropriate, and BLM has provided no such findings in the context of the SDRMP.<br><br>For example, the NTT recommendations would apply a | We considered and analyzed the conservation measures developed by the NTT and incorporated these in the RMP. The Proposed RMP identifies lek buffers to protect against disturbances of various sources, but focus the greater protections within the PHMAs. |

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| | | | 4-mile buffer around leks with no surface disturbance allowed. For another example, the NTT Report calls for an unambiguous requirement that closed-loop drilling with no reserve pits be required within Core Areas, not incorporated into the Preferred Alternative. | |
| DR-MTDK-SD-13-0027-9 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | We are concerned that no alternative will uphold BLM's obligation to manage Sensitive Species to "minimize or eliminate threats," • either within or outside of Core Area habitats. As detailed elsewhere in these comments, mitigation measures applied under Alternative D (and the even less-protective Alternatives A and B) will inevitably lead to serious impacts to sage grouse populations within Core Areas. This result represents an unnecessary and undue degradation of key sage grouse habitats. | The BLM has developed protective measures for sage-grouse while staying true to its multiple use mandate. Since BLM does not manage all lands in priority habitat, we cannot guarantee that habitat will not be adversely impacted in some cases. We are striving through cooperative efforts with landowners, the state, and industry to limit impacts overall. The implementation of Sage Grouse Initiative programs on state, BLM and private lands is one example of this coordination. Development of a sage grouse working group to bring various players together to educate and inform others about sage grouse management is another example.<br><br>The actions outlined in the alternatives were developed specifically to address all threats to sage-grouse in the planning area. Mitigation measures as described in the alternatives and in Appendix V-1 are detailed and address all uses that may potentially affect sage-grouse. The preferred alternative in the Proposed RMP and Final EIS provides an expanded PPA area that includes an additional 35,000 surface acres and over 125,000 acres of mineral estate. |
| DR-MTDK-SD-13-0028-22 | The Wildlife Society, Silka Kempema | Wildlife Association | There should be alternatives that discuss the beneficial and adverse impacts of the lack of studies or other types of studies so the analysis can show that this is needed and is more beneficial to wildlife. Wind development needs to be avoided and excluded in all large, contiguous blocks of grassland as the private blocks of grassland continue to be destroyed for agricultural uses. Blocks are | There is no denying that more studies on all sorts of natural resource topics, especially wildlife, are needed. While it seems that this should be apparent already in the draft RMP/EIS, final revisions have been made to better reflect where there are more research needs. BLM's multiple use mandate requires that all resources and resource users and their needs be considered with and |

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| | | | fragmented by any human derived feature (e.g., agricultural uses, fences, transmission lines, roads, burned areas, energy development) that subdivides them. Maintaining habitat connectivity between prairie grouse leks is important because both males and females use multiple leks throughout the breeding season. Other wildlife is also negatively affected by large grassland blocks being fragmented. There needs to be alternatives analyzing the fragmentation effect caused by wind energy. | against the needs of other resources and other users. South Dakota BLM has stipulations in place to protect sage-grouse from wind energy development, and consequently to protect other species that use the same habitat. Tables 2-2 and 2-3 in the Draft RMP/EIS provided a list of goals and alternatives to address many of the concerns brought forward. In addition Chapter 3 provided background on the current situation including development trends on public lands, habitat fragmentation and loss of connectivity. In the Proposed RMP/Final EIS wind development has been limited in most areas because of wildlife concerns. Refer to the wind energy maps in chapter 2 (Maps 2-19 through 2-23) that show areas as open, avoidance, and exclusion; many areas have been allocated as exclusion or avoidance due to reasons mentioned in the comment. |
| DR-MTDK-SD-13-0028-5 | The Wildlife Society, Silka Kempema | Wildlife Association | The small amount of acres that have been determined to be affected by energy development and renewable energy shows that BLM has very little data on prairie grouse leks and a census of prairie grouse leks does not exist for the entire planning area. How does BLM plan to enforce the stipulations on an incomplete data set? Prairie grouse lek surveys will need to be required before any proposed projects/actions can be analyzed in prairie grouse habitat. | This is a valid concern, and one of which BLM is aware. Until the time when comprehensive surveys of prairie grouse leks have been completed, currently available data, expert opinion, and project specific reconnaissance is the best available information. South Dakota GFP is currently starting a prairie grouse survey project that will help identify a greater number of lek locations across the planning area. This is to be a multi-year effort, and findings will be used in project-level planning as they become available. |
| DR-MTDK-SD-13-0028-8 | The Wildlife Society, Silka Kempema | Wildlife Association | Spot treatments in Protection Priority Areas (PPAs) only, using IPM methods within suitable nesting or brood rearing habitat of known sage-grouse leks from March 1 "“ June 30. This does not apply to nesting habitat outside of PPAs.<br><br>This alternative contradicts Alternative #1, Invasive Plants section, because this is stating there would be spot | The statement "this does not apply to nesting habitat outside of PHMAs" was deleted to avoid confusion. In summary only spot treatments would be allowed in PHMAs and within 3 miles of leks (within and outside PHMAs). Note the Draft RMP/EIS used the acronym PPA instead of PHMAs. |

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| | | | treatments in PPA's only. | |
| DR-MTDK-SD-13-0029-10 | World Wildlife Fund, Martha Kauffman | Wildlife Association | WWF supports the adoption of BLM's best management practices as outline in Information Bulletin (MT2011-033) to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core/priority areas to prevent deaths. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2010). Areas with a high threat of West Nile virus should be prioritized for reduction of standing water and other factors that increase the likelihood of becoming Culex mosquito breeding grounds. | Management common to all alternatives includes managing water developments to reduce the risk of West Nile virus. Schrag et al. (2010) will be cited as appropriate during the final revision. |
| DR-MTDK-SD-13-0029-6 | World Wildlife Fund, Martha Kauffman | Wildlife Association | It is unclear why the different sizes of PPAs were delineated for Alternatives C and D and the exact features that went into identifying the PPA. The BLM should clarify what the difference between different sizes of PPA delineations are as well as how the "most active leks" • and "three lek buffers" • are defined in the following statement, "The most active lek areas and three lek buffers, major habitat areas, and year-round bird use areas were delineated in Butte and Harding counties as PPAs" • (p. 35). | After consulting with South Dakota Game, Fish, & Parks and receiving a map of their new sage-grouse core areas that were finalized in December 2014, BLM allocated all state sage-grouse core areas as PHMAs in the Proposed Action (Alternative D) for the Final RMP. The new PHMA in Alternative D include the portion of PPA present in Alternative C but absent in Alternative D. The sentence in question will be revised to clarify, as "three lek buffers" appears to be a typo. "Most active lek areas" are those areas where there is a relatively high concentration of active leks compared with the rest of the landscape. Each lek was then buffered by 4 miles, and the buffered areas were incorporated into the PPAs. |
| DR-MTDK-SD-13-0029-7 | World Wildlife Fund, Martha Kauffman | Wildlife Association | Alternative D does not include several important sage-grouse areas (Doherty, K.E. 2008. Sage-grouse and energy development: integrating science with conservation planning to reduce impacts. Dissertation, University of Montana, Missoula, Montana, USA) | BLM has incorporated the draft sage-grouse core areas developed by the State/Game, Fish & Parks as PHMAs in the Proposed RMP. |

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| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | where BLM also manages the surface lands which would make this additionally important to retain in the PPA (see Figure 4 for core areas not included in Alternative D PPA and refer to the BLM's Map2-5 for BLM lands within Alternative C). | |
| DR-MTDK-SD-13-0029-9 | World Wildlife Fund, Martha Kauffman | Wildlife Association | While timing limitations may address direct impacts to winter range areas, surface disturbing activities could lead to degradation of the habitat (p. 657). Since the BLM states that winter habitat areas are not well documented to date (p. 360), delineating critical winter habitat areas for sage-grouse should be a priority. BLM should address both direct and indirect impacts to winter range and improve documentation of specific winter habitats in which to apply conservation measures. | Sagebrush areas are identified as winter range in the RMP and impacts addressed. BLM does not have any studies that document sage grouse during winter time but sage-brush is known to be important to sage-grouse in the winter. BLM will likely continue to work with South Dakota Game, Fish & Parks to fill in knowledge gaps. |
| DR-MTDK-SD-13-0030-7 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | Section 1.4.1 of the BLM National Sage-grouse Habitat Conservation Strategy is entitled "Guidance for the Management of Sagebrush Plant Communities for Sage-Grouse Conservation," and hence is directly applicable to the SD planning area. The Strategy includes a host of enforceable limitations and requirements on livestock grazing to protect sagebrush habitats, and to maintain, enhance or restore sagebrush habitat, including:<br><br>• "Avoid constructing livestock management facilities (i.e., corrals, tanks, troughs, pipelines, fences, etc.) next to leks" • ;<br>• "Design and locate the placement of fences for livestock . . . so as not to disturb important sage-grouse habitat areas" • ;<br>• "Consider seasonal closures to protect priority sage-grouse habitat if other alternatives will not achieve desired objectives" • ;<br>• "Use grazing practices that promote the growth and persistence of native shrubs, grasses and forbs needed by | Thank you for your comment. All of the items mentioned are addressed in Chapter 2 or Appendix V-1. For a description of mitigation measures and conservations actions pertaining to sage-grouse habitat refer to Appendix V-1. |

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| | | | sage-grouse for seasonal food and concealment. . ..Vegetation structure (height) should be managed so as to provide adequate cover for sage-grouse during the nesting period" • ;<br>•"Maintain seeps, springs, wet meadows, and riparian vegetation in a functional and diverse condition for young sage-grouse" • ;<br>•"Maintain sagebrush and understory diversity . . . adjacent to crucial season sagegrouse habitat unless removal is necessary to achieve sage-grouse habitat management objectives" • and<br>•"Where other grazing management options are not achieving, or cannot achieve, the desired objectives, a short-term option may be livestock exclusion."<br><br>These measures must be directly incorporated in the current plan | |
| DR-MTDK-SD-13-0030-9 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The Montana/Dakotas Standards for Rangeland Health are the yardstick by which the health of grazing allotments is measured. 34 Currently, 1,400 acres do not meet these standards. 35 These allotments must be brought into compliance, and specific standards should be incorporated into the RMP to guarantee that sage grouse PPAs and General Habitats will always be maintained in good condition. Moreover, a hard look should be taken at whether the Standards for Rangeland Health are even sufficient measures of sage-grouse habitat value; a recent ruling in the Office of Hearings and Appeals (Department of Interior) suggests that BLM's qualitative and inconsistent monitoring methods do not assure habitat protection and cannot be the full measure of grazing impacts to this species. See WWP v. BLM, UT-020-09-01, Office of Hearings and Appeals, May 16, 2013. | It is important to the BLM that grazing allotments not meeting standards and guidelines are brought into compliance, and BLM employs a number of actions to bring such allotments back into compliance. The purpose of the rangeland health standards and guidelines are to ensure that rangelands are maintained in healthy condition for a variety of wildlife and for use by livestock. In places identified as important sage-grouse habitat, an eye towards sagebrush health and vigor in particular is held. BLM utilizes a variety of evaluation and monitoring methods before making determinations about rangeland health. For the Proposed RMP, the BLM has included additional management actions and guidance for incorporating Greater Sage-grouse decisions into grazing authorizations. |

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| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0035-1 | Chance Davis | Individual Consumer | I comment that RMP fails to provide a wide range of alternatives for the GSG in that the only alternatives are all based on the NTT report. The conservation measures in BLM manual 6840 could be an adequate regulatory tool if properly implemented but that was not an alternative so was not analyzed. This one size fits all approach by the NTT does not take into consideration the unique features of the area, relatively poor habitat that is on the fringe of GSG range. | One of the factors the US FWS determined as contributing to sage-grouse being warranted for listing was lack of appropriate regulatory mechanisms to protect sage-grouse. Therefore, in light of the pending listing decision for sage-grouse, the feasible alternatives must include sufficient protections as to ensure that sage-grouse will not continue to decline. In addition to guidance from the NTT, BLM incorporates findings from scientific literature and, in some cases, expert opinion of those with knowledge specific to the South Dakota planning area. The South Dakota BLM recognizes that sage-grouse and sagebrush habitat in the planning area does not resemble sage-grouse and sagebrush in the Great Basin and has tailored its management of sagebrush and sage-grouse accordingly. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | PACs (otherswise refered to as PPAs): COT Report objective: Retain sage-grouse habitats within PACs (pertains to PAC or PPA designation; actions below this line are evaluated independent of PAC or PPA designation for each Alternative). Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS comments: Alternative A is a high concern (red highlight). No PACS or PPAs designated. PPAs designated in Alternative B and D but they exclude Owl Creek areas (Yellow highlight). PPAs or PACs designated in Alternative C but they exclude Owl Creek areas (also designates PPAs or PACs as ACECs (Green highlight). Other remarks: Designation of ACEC should be separate from PPA status. Would like to see a comparison of SD PPA/GHA boundaries with ND,MT,WY. | A comparison chart of COT objectives and RMP actions for the Proposed RMP was added to the sage-grouse section of Chapter 4. The Proposed Action for the RMP now includes larger PHMAs that includes all of the areas mentioned in the comment. Refer to Map 2-5. |
| DR-MTDK-SD-13- | US Fish and Wildlife Service, Terry | Federal Government | PACs: COT Report objective: If PACs or PPAs are lost to catastrophic events, implement appropriate restoration efforts. | As noted in Chapter 3 of the Draft RMP/EIS, post burn impacts of large scale fires are addressed through a burned area emergency rehabilitation process that |

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| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| 0046 (Attachment) | Quesinberry | | Grey highlight for all alternatives. Address PACs or PPAs lost to catastrophic events | would be implemented after evaluation by a burned area rehabilitation team. This process is described in Wildland Fire and Ecology section of Chapter 3 of the Draft RMP/EIS. In addition Appendix B, C and D provide direction for monitoring, mitigation, and restoration practices to address various forms of disturbance. Reseeding of disturbed areas is also addressed in the vegetation section of table 2-2 MA 1 and 4. These practices would address impacts of large scale, catastrophic events. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | PACs: COT reports objectives states: Restore and rehabilitate degraded sage-grouse habitat within PACS or PPAs. Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS comments: Appendix V (now Appendix V-1) (orange). Other remarks: Very general discussion about restoration included with fire; not sure if this applies in other program areas (orange highlights). | The management common to all alternatives states: Within sage-grouse habitat, BLM would evaluate areas for habitat restoration or enhancement potential. Specific restoration or enhancement actions would be determined at the project (implementation) level. BLM has no large blocks of land that were converted to other uses and then reseeded to non-native species. Areas degraded by mining include small tracts of BLM lands. For this reason, BLM has no large blocks of public land where restoration activates could be implemented. Restoration efforts would focus on specific locations that have potential for sagebrush reestablishment or improvement. Areas impacted by early bentonite mining projects would be high priority for restoration. |
| DR-MTDK-SD-13-0046 (Attachment) | | | PACs: COT report object states: Identify areas and habitats outside of PACs or PPAs which may be necessary to maintain viability of sage-grouse. If development or vegetation manipulation activities outside of PACs or PPAs are proposed, the project proponent should work with federal, state or local agencies and interested stakeholders to ensure consistency with sage-grouse habitat needs. Are locally-derived actions/measures consistent with | BLM has identified important sage-grouse habitat in coordination with USFWS, the State of SD, and area Counties. A suite of management actions identified in Table 2-2 addresses management in general habitat including coordination with stakeholders and local agencies. BLM does not have large blocks of altered lands that could be identified as restoration areas. Restoration efforts would address small areas where sagebrush has been removed or degraded and this |

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| | | | conservation objective? SDFO of FWS comment: Alternative A: not addressed (red). Alternatives B, C and D comment: GHA identified but management actions were unclear. Other remarks: We request that restoration areas be identified and management actions identified. | would be done at the project level. Management Actions (MA) specific to general habitat include MA 10-18. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | PACs: COT report objective states: Re-evaluate the status of PACs and adjacent sage-grouse habitat at least once every 5-years, or when important new information becomes available. SDFO comments on all alternatives: not addressed (No highlight) Other remarks: This needs to be addressed in the FEIS. | An updated sage-grouse monitoring strategy is included in the Proposed RMP in the narrative section of Chapter 2. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | PACs: COT report objective states: Actively pursue opportunities to increase occupancy and connectivity between PACs. SDFO of FWS comments: No indication that joint management of SG populations between BLM FOs in SD/ND/MT/WY. No indiciation that joint management of sage-grouse is being considered. Alternative A is a concern as no PACS identified (red highlight). Alternative B and D comments: loss of some connectivity with proposed PPA boundary (yellow). Alternative C comments: provides for better connectivity with WY/MT (green). | The BLM, SD Field Office has worked across boundaries with Montana, North Dakota on these concerns. The PHMAs in the Proposed Action for the RMP and Final EIS now provide better connectivity between these states. The changes to the sage-grouse PHMAs also provides improved consistency with management of sage-grouse with the SD GFP as BLM PHMAs and the draft State sage-grouse core areas are the same. Management Common to All Alternatives states: Maintain, restore or enhance sage-grouse habitat and connectivity between sagebrush habitats, with emphasis on those habitats occupied by sage-grouse. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | PACs: COT report objective states: Maintain or improve existing habitat conditions in areas adjacent to burned habitat. SDFO FWS comment for each Alternatives: No current burned habitat. Other remarks: Should this be discussed in the FEIS in case of habitat loss to fire? (grey highlight) | Refer to General Habitat section of Table 2-2 and the goals and management actions common to all alternatives for sage-grouse. If large scale fires did occur in PHMAs, BLM would place additional emphasis in protection of general habitat but this was be very situational and would be addressed at the project level. Refer to Alternatives Table 2-2, Fire Management and Ecology section; MA 3 and management common to all alternatives 10, 11 and 14. |

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| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Fire: Y: COT report objective states: Retain and restore healthy native sagebrush communities within greater sage-grouse range. Measures/options: Restrict or contain fire within the normal range of fire activity (assuming a healthy native perennial sagebrush community), including size and frequency, as defined by the best available science. Design and implement restoration of burned sagebrush habitats to allow for natural succession to healthy native sagebrush plant communities. Implement monitoring programs for restoration activities. SDFO FWS comment: Only general information is provided (orange highlight). No stipulation for Alternative A (red). Guidance is not clear about specific habitats and prescribed fire uses in Alternatives B and D (red). Prescribed fire is not allowed in Alternative C (green). | The Proposed RMP and Final EIS provides direction in Alternative B and D that prescribed fire would only be allowed in PHMAs to improve habitat. Additional monitoring language has been added to the Proposed RMP and Final EIS. Since there is no burned habitat at the current time on BLM land, restoration must be tailored to the soils and vegetation on the specific sites that are impacted. At this time, BLM has no need to implement restoration of burned areas. The proposed RMP provides direction for revegetation and other restoration practices in the vegetation section and in Appendices B, C and D. Refer to Fire Management and Ecology sections of the Alternatives Table 2-2 under management common to action alternatives (1) and MA 1-3. Many of the specific details about restoration are addressed through project level NEPA based on the type of disturbance and the ecological sites present in the disturbed area. Where sage-grouse habitat is present, restoration of sage-brush and associated native species would be a high priority |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Fire: Y - COT report objective states: Retain and restore healthy native sagebrush communities within greater sage-grouse range. Measures/options: Immediately suppress fire in all sagebrush habitats. FWS remarks: Suppression is required for all fires for all alternatives (green). SDFO FWS comment: From Chapter 2, page 32 | Fire suppression is required for all Alternatives as noted in the comment. Refer to MA 1and 2 in Fire Management and Ecology section of Table 2-2. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Non-native, Invasive Plant Species: L - COT report objective states: Maintain and restore healthy, native sagebrush communities. Measures/Options: Reduce or eliminate disturbances that promote the spread of these invasive species. Monitor and control invasive vegetation post-wildfire for at least three years. Require best management practices for construction | Refer to the Best Management Practices in Appendix B, the Conservation Actions in Appendix V-1 and the Invasive Plant section of Table 2-2 which adopts an integrated pest management (IPM) system to manage non-native and invasive plants. Native species requirements and direction for restoration is addressed in vegetation section of Table 2-2 MA 1, 2 and 4 and in |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | projects in and adjacent to sagebrush habitats to prevent invasion. Restore altered ecosystems such that non-native invasive plants are reduced to levels that do not put the area at risk of conversion if a catastrophic event were to occur. SDFO FWS comment to all Alternatives: Unknown (yellow) | Appendix B, C and N. Spec. Status Species management common to all alternatives 14. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Non-native, Invasive Plant Species: L - COT report objective states: Retain and restore healthy native sagebrush communities within greater sage-grouse range. Eliminate intentional fires in sagebrush habitats, including prescribed burning of breeding and winter habitats. SDFO FWS comment: No stipulation for Alternative A (red). Guidance is not clear about specific habitats and prescribed fire uses. No stipulations in Alternative A (red). Prescribed fire allowed in Alternatives B and D (red). Prescribed fire is not allowed in Alternative C (green). | The Final RMP/EIS provides for use of prescribed fire in Alternative B and D but would only allow prescribed fire in the Proposed Action if it is conducted to improve sage grouse habitat. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Energy Development: Y: COT report objective states: Energy development should be designed to insure that it will not impinge upon stable or increasing greater sage-grouse population trends. Avoid energy development in PACs. Identify areas where leasing is not acceptable, or not acceptable without stipulations for surface occupancy that maintains SG habitats. SDFO FWS comments: Alternative A: Appendix E.1 (red), Alternative B and D: Appendix E.2 and E.3 (Orange), Alternative C: Appendix E.3 (yellow). | The Draft and Final EISs identify in each Alternative areas that are closed, open with standard stipulations, open with major restrictions (NSO or ROW exclusion areas), open with moderate restriction (CSU or ROW avoidance areas) and open with low restrictions (timing limits) for various types of energy development. For a summary refer to Table 2-1 (summary of restrictions by Alternative). Additional details can be found in Table 2-2 Summary of Alternatives. The areas closed, open and restricted are shown by Alternative on Maps 2-15 through 2-18 for ROWs, Maps 2-19 through 2-23 for renewable energy ROWs and Maps 2-25 through 2-28 for oil and gas development. For specific details about actions and restrictions related to sage-grouse management refer to the special status species section of Table 2-2. PAs are shown in Maps 2-3, 2-4 and 2-5. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Energy Development: Y: COT report objective states: Energy development should be designed to insure that it will not impinge upon stable or increasing greater sage-grouse population trends. Options/measures: Avoid SB removal or manipulation in greater sage-grouse breeding or wintering habitatsMeasures/Options: If avoidance is not possible in PACs due to pre-existing valid rights, adjacent development, or split estate issues, development should only occur in non-habitat areas, including all appurtenant structures, with an adequate buffer that is sufficient to preclude impacts to sage-grouse habitat from noise, and other human activities. SDFO FWS comments: Alternative A: No PAC designated (red), Alternative B and D: NSO in PPA but less PPA, smaller buffer (orange). Alternative C: NSO PPA (yellow). | The Proposed RMP in the Final EIS provides additional areas protected from energy development through NSO restrictions, ROWs exclusion and limits on other surface disturbing activities in PAs that include all BLM surface and mineral estate in PAs (approximately 127,000 surface estate acres and 412,000 subsurface mineral acres). Refer to Map 2-5 for a map of the PA. For those projects protected by valid existing rights, BLM may require the proponent to move to proposed projects out of habitat within the limits of applicable laws and regulations. For oil and gas projects this would be limited to 200 meters. Refer to Appendix E. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Energy Development: Y: COT report objective states: Energy development should be designed to insure that it will not impinge upon stable or increasing greater sage-grouse population trends. Options/measures: If development must occur in sage-grouse habitats due to existing rights and lack of reasonable alternative avoidance measures, the development should occur in the least suitable habitat for sage-grouse and be designed to ensure at a minimum that there are no detectable declines in sage-grouse population trends (see row below and COT report for measures to facilitate this). SDFO of FWS comment: Unknown for all alternatives (red). | The Proposed RMP in the Final EIS provides additional areas protected from energy development though NSO restrictions, ROWs exclusion and limits on other surface disturbing activities on all BLM surface and mineral estate in PAs ( approximately 127,000 surface acres and 412,000 mineral acres). Refer to Map 2-5 for a map of the PA. For those projects protected by valid existing rights, BLM may require the proponent to move proposed projects out of habitat within the limits of applicable laws and regulations. For oil and gas projects this would be limited to 200 meters. Refer to Appendix E. |
| DR-MTDK-SD-13-0046 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Grazing : L COT report objective states: Conduct grazing management for all ungulates in a manner consistent with local ecological conditions that maintains of restores healthy sagebrush shrub and | Refer to Grazing Management Section of Table 2-2 which provides conservative stocking rates, implementation of standards for rangeland health and guidelines for grazing management, prioritization of |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| (Attachment) | | | native perennial grass and forb communities and conserves the essential habitat components for greater sage-grouse (shrub and nesting cover). Areas which do not currently meet this standard should be managed to restore these components. Adequate monitoring of grazing strategies and their results, with necessary changes in strategies, is essential to ensuring that desired ecological conditions and greater sage-grouse response are achieved. Livestock and wild ungulate numbers must be managed at levels that allow native sagebrush vegetative communities to minimally achieve Proper Functioning Conditions(PFC; for riparian areas) or Rangeland Health Standards (RHS; uplands). SDFO of FWS comments for all Alternatives: Appendix A, Dakota standards, unknown (yellow). Other remarks: Concern over how veg. management will occur if allotments are retired. | rangeland health assessments and processing of grazing permits/leases within priority greater sage-grouse habitat areas. BLM would focus this process on allotments that have the best opportunities for conserving, enhancing or restoring habitat for greater sage-grouse. Also refer to Appendix V-1 which addresses specific details about grazing in sage-grouse habitat. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Sagebrush Removal/Elimination: L -COT report objective states: Avoid SB removal or manipulation in greater sage-grouse breeding or wintering habitats. SDFO of FWS comments for all alternatives: Unknown (yellow). | Mechanical treatments within big sagebrush habitat crucial to sagebrush obligate species would be carried out to enhance that resource. Conversion of native vegetation to tame pastures would only be allowed to improve, maintain, or protect habitat, sensitive soils, riparian vegetation or special status plants or animals during vulnerable periods and in cases where alternative forage sources are needed to defer or change livestock grazing patterns to reduce disturbance to wildlife and such conversion would be limited to 1% of the public lands in the planning area over the life of the RMP. Refer to MA 1, 2 and 4 in the vegetation section of Table 2-2. |
| DR-MTDK-SD-13-0046 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Range Management Structures (no ratings). COT report objective states: Avoid or reduce the impact of RMS on greater sage-grouse. Options/Measures: Range management structures should be designed and | The Draft and Final EIS are very clear on this matter as noted in the management common to all alternatives which states:<br>-New fences would follow BLM specifications (BLM |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| (Attachment) | | | placed to be neutral or beneficial to sage-grouse. Structures that are currently contributing to negative impacts to either sage-grouse or their habitats should be removed or modified to remove the threat. SDFO of FWS comment: Appendix D, unknown (orange). | Handbook 1741-1 and WO-IM-2010-022) to allow for wildlife passage and located or marked as feasible to minimize collisions and other wildlife issues, except for fences built specifically to keep wildlife out of an area.<br>-Existing fences would be reviewed to identify areas where fence modification or removal could be implemented to improve wildlife movement problems.<br>-New fences would be located to avoid sage-grouse leks and winter range and/or marked if these areas cannot be avoided.<br>-Manage water developments to reduce the spread of West Nile virus within sage-grouse habitat areas (especially for those water impoundments where water levels are artificially maintained).<br>-Install reflectors on fences for sage-grouse where appropriate.<br>• Manage water developments to reduce the spread of West Nile virus within sage-grouse habitat areas.<br>• Follow current "Reducing Avian Collisions with Power Lines" (APLIC)" for all land use authorizations. Refer to MA 10 in the grazing section and Management common to all alternatives (8) for details about range improvements and fences. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | <u>Agricultural conversion: L - COT report objective states:</u> Avoid further loss of sagebrush habitat for agricultural activities (both animal and plant production) and prioritize restoration. In areas where taking agricultural lands out of production has benefited GSG, the programs supporting these actions should be targeted and continued (e.g., CRP/SAFE). Threat amelioration activities should, at a minimum, be prioritized within PACS, but should be considered in all greater sage-grouse habitats. Options/Measures: Are locally-derived actions/measures consistent with | Refer to Grazing Management Section of Table 2-2 which provides conservative stocking rates, implementation of standards for rangeland health and guidelines for grazing management, prioritize completion of rangeland health assessments and processing grazing permits/leases within priority greater sage-grouse habitat areas. BLM would focus this process on allotments that have the best opportunities for conserving, enhancing or restoring habitat for greater sage-grouse. Also refer to Appendix V-1 which addresses specific details about grazing in |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | conservation objective? SDFO of FWS comment: No management actions (orange). Other remarks: Agriculutural conversion is presently a low threat | sage-grouse habitat. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Mining: Y: COT report objective states: Maintain stable to increasing greater sage-grouse populations and no net loss of greater sage-grouse habitats in areas affected by mining. Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS comment: Alternative A, B and D: open to locatable/salable minerals (red). Alternative C: PPAs withdrawn from locatable, closed to salable (green). Other remarks: Without Alt C PPA any withdrawl/closure may be of little benefit to SG since most mining would occur in that area. | In the Proposed RMP/ Final EIS, sage-grouse PHMAs have been expanded based on input from the public and cooperating agencies. Additional actions have been added under salable and locatable minerals to clarify that surface disturbing and disruptive activities would be avoided in PAs within the limits of the mining laws. Refer to Spec. Status Species Section of Table 2-2; Management Action (MA) 21. BLM would be required to honor valid existing rights in areas already claimed but would work with project proponents to address potential impacts through a plan of operation. Protection of Sage-Grouse habitat is also addressed in MA 7-12 of the Minerals section of Table 2-2. Appendix V-1 addresses specific aspects of mining operations in detail. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Recreation - NCOT report objective states: In areas subjected to recreational activities, maintain healthy native SB communities based on local ecological conditions and with consideration of drought conditions, and manage direct and indirect human disturbance (including noise) to avoid interruption of normal greater sage-grouse behavior. Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS comment for all alternatives: Not addressed relative to SG or threat level identified (yellow). Other remarks: At a minimum management actions in a travel management plan should address restricting recreation activities (e.g. motorized activities in SG habitat) | Alternatives in the Draft and Final RMP/EIS limits travel to existing roads and trails. The Proposed RMP identifies all sage-grouse PHMAs as a travel management planning areas where implementation planning (project level planning) would be used to address specific concerns related to travel use and would limit all travel to designated routes. Management common to all Alternatives states that Applications for Special Recreation Permits in sage-grouse priority habitat may be denied if approval of the permit would adversely impact sage-grouse or sage-grouse habitat (Recreation Section of Alternatives - Table 2-2). As noted in Chapter 3 recreation section most recreation in sage-grouse habitat is very dispersed and is associated with fall hunting seasons. |
| DR- | US Fish and | Federal | Ex-Urban Development / Urbanization: N - Limit | BLM does not have the authority to limit development |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| MTDK-SD-13-0046 (Attachment) | Wildlife Service, Terry Quesinberry | Government | urban and ex-urban development in greater sage-grouse habitats and maintain intact native sagebrush communities. Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS comment: Not addressed relative to SG or threat level identified under all alternatives (yellow). Other remarks: issue needs more evaluation. | on private lands. BLM has developed language in the RMP to allow transfer of other lands to federal ownership for the benefit of sage grouse or other special status species (Table 2-2). |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Infrastructure: Y - COT report objective states: Avoid development of infrastructure within PACs. No new development of infrastructure within PACs. Designated, but not yet developed infrastructure corridors should be re-located outside of PACs unless it can be demonstrated that these corridors will have no impacts on the maintenance of neutral or positive sage-grouse population trends or habitats. New infrastructure should be avoided where individual state plans have identified key connectivity corridors outside of PACs. Alternative A: No PACs designated (red). Other Alternatives not color coded or commented on. | Sage-grouse PHMAs would have No Surface Occupancy restrictions. There are no designated infrastructure corridors in the PHMAs as these concerns addressed as follows: Sage grouse PHMAs would be ROW exclusion areas for renewable energy ROWs and ROWs avoidance areas for other types of ROWs. Refer to MA 11 and 12 for general habitat and MA 24 for PHMAs. In the Proposed Action for the RMP key sage-grouse connectivity corridors are located within the PHMAs shown in Map 2-5. MA 24 for the Proposed Alternative in Spec. Status Species Table 2-2 states: Where new ROWs associated with valid existing rights are required, co-locate new ROWs within existing ROWs or where it best minimizes sage-grouse impacts. |
| DR-MTDK-SD-13-0046 (Attachment) | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Infrastucture: Y - COT report objective states: Where state sage-grouse management plans provide an effective strategy for infrastructure those strategies should be implemented. In all other situations the conservation options in the COT report should be considered. Alternative A: No PACs designated (red). Other Alternatives not color coded or commented on. Other remarks: state plan being modified. | The SDFO has worked with the State of SD to provide input and consistency between the state of SD sage-grouse Plan and the SD RMP. BLM, SDFO has modified PHMAs to match the draft state sage-grouse core areas and both parties have reviewed the respective plans to insure consistency. |
| DR-MTDK-SD-13-0046 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Fences (no ratings). COT report objective states: Minimize the impact of fences on greater sage-grouse populations. Are locally-derived actions/measures consistent with conservation objective? SDFO of FWS | Refer to Management Common to All Alternatives (Spec. Status Species Section) which states: 1) Install reflectors on fences for sage-grouse where appropriate. 2) New fences would be located to avoid sage-grouse |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| (Attachment) | | | comments to all alternatives: Appendix V (now Appendix V-1) (green). | leks and winter range and/or marked if these areas cannot be avoided. |
| DR-MTDK-SD-13-0046-1 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | from our COT Report consistency assessment for each alternative where we have provided more detailed information on how the proposed actions in the DRMP/EIS match up with the conservation measures in the COT Report. | All of these concerns were broken out into separate comments and addressed. The changes between the draft and FinalRMP/ EIS address of these concerns. |
| DR-MTDK-SD-13-0046-10 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 2, Page 47. Conservation Groups Alternative: The second paragraph states "As described in the Wildlife and Special Status Species section in Chapter 2, this DRMP/EIS delineates three types of sage-grouse habitat areas as part of the planning process (refer to Maps 2-4 and 2-5), including: Sage-Grouse Habitat - Protection Priority Areas (PPAs), Sage- Grouse Habitat - Restoration Areas (RAs), and Sage-Grouse Habitat - General Sage-Grouse Areas; " • however, neither map identifies RAs nor does there appear to be a Wildlife and Special Status Species section in Chapter 2. | Habitat Restoration Areas were considered but eliminated from the draft early in the planning process as SD has no large blocks of BLM public land where sage-brush communities have been altered or converted to other uses. Sage-brush restoration would be addressed in small areas that have altered and this would be done at the project level. For these reasons, no large scale restoration areas were identified. |
| DR-MTDK-SD-13-0046-11 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 3, Page 359. In the second to the last paragraph, it states "South Dakota has regulatory mechanisms in place to protect sage-grouse at the local level." • Please describe these mechanisms. | This section has been corrected. |
| DR-MTDK-SD-13-0046-12 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 3, Page 359. The last paragraph states "recent research has shown there is interaction with the populations in Wyoming, Montana, and North Dakota." • Please describe how this interaction will be affected if the PPA boundaries in Alternatives B and D are chosen, thereby excluding an important area of connectivity with Wyoming/Montana, and how the interaction with North Dakota is affected without a PPA designation in northern Harding County. | South Dakota Game, Fish, & Parks was in the process of developing a sage-grouse management plan that includes new core areas during the later stages of the Draft RMP/EIS development. BLM has had opportunity to review the new core areas and since they both overlap current proposed PHMAs and also encompass more habitat areas, BLM has adopted these core areas in the Proposed Action for the RMP. By adopting the state's sage-grouse core areas as BLM's PHMA, the areas of interaction across state lines provide greater protection than would be provided in any of the other alternative, including Alternative C. The new PHMA includes more |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | of Harding County and borders both North Dakota and Wyoming in addition to Montana. |
| DR-MTDK-SD-13-0046-13 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 4, Bentonite Mining: Please indicate if the statement that "all mining activities would occur in the general sagebrush habitat area" • is applicable if the PPA boundaries in Alternative C are selected. | No. Some mining would likely occur outside of general habitat. This has been clarified in the Proposed RMP. These areas are displayed on Map 2-4 and Map 2-8. |
| DR-MTDK-SD-13-0046-14 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Appendix V (now Appendix V-1), GSG Mitigation/Conservation: Please clarify if the section on Wildfire Suppression, Fuels Management and Fire Rehabilitation, subsection Restoration, applies to only fire rehabilitation in sagebrush areas or sagebrush restoration in general. | BLM does not intend to burn sagebrush/sage-grouse habitat unless burning was done specifically to improve habitat. South Dakota does not have issues with juniper or pine encroachment that may be treated with fire in sage-brush habitat. Fuels management and fire suppression would be used in the case of emergency in sage-grouse habitat, and any other fire activity would be vetted with USFWS and State before implementation. Any burned areas of sagebrush would be restored by BLM regardless of the cause of fire. Addressed in Fire Management and Ecology under MA-2 and 3 and Management Common to Action Alternatives B, C and D (1) and Management Common to All Alternatives 10 and 11 in Alternative Summary Table 2-2. |
| DR-MTDK-SD-13-0046-18 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Knick, S.T., Hanser, S.E., and K.L. Preston. 2013. Modeling ecological minimum requirements for distribution of greater s age-grouse leks; implications for population connectivity across their western range, U.S.A. DOI- 10.1002/ece3.557: Ecology and Evolution, online. | Thank you for providing these references. They have been considered in the revisions and incorporated into the Final EIS document were applicable. |
| DR-MTDK-SD-13-0046-2 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Area of Critical Environmental Concern (ACEC) designation for GSG Priority Protection Areas (PPA)*: Throughout the document, references are made as part of Alternative C to designate all PPAs as an ACEC. Additionally throughout the document, statements are made that an ACEC designation decreases management | A PPA ACEC was not selected as the preferred alternative because of the concerns expressed by the commenter. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | options, most notably that such a designation "may shift and concentrate future activities or infrastructure development onto private or non-federal lands adjacent to the PPA" • and "the BLM would lose control over project design features, hazardous materials management, and mitigation of site-specific impacts, and would not be able to require disturbed areas to be reclaimed." • Therefore, in light of the information contained in the DRMP/EIS and with the difficulties of managing a mostly checkerboard pattern of BLM ownership, we are not encouraging the BLM to designate all PPAs as an ACEC as is done in Alternative C as this option may not be an adequate regulatory mechanism overall for the management of the GSG in South Dakota. However, such a designation for portions of the PPAs, especially in Butte County with more contiguous areas of BLM ownership, may be an appropriate management option, and we encourage the BLM to consider using the ACEC selectively in the FRMP/EIS to assist GSG management. | |
| DR-MTDK-SD-13-0046-3 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 3: The discussion of GSG does not include any mention of the COT Report nor the specific localized and widespread threats and Priority Areas for Conservation (PAC)* discussed therein that apply specifically to the GSG population in the planning area. Discussion of these threats, recommended conservation objectives for addressing them, and PACs per the COT Report are relevant to Chapter 4 effects analysis and should therefore be included in Chapter 3. We also recommend that the most current GSG literature be referenced in this section, including Knick et al. (2013) | Mention of the COT Report in Chapters 3 and 4, where appropriate, has been remedied during revision. That said, pages 359 to 362 of Chapter 3 do contain detailed descriptions of specific localized and widespread threats. It does not describe PHMAs at this point in the chapter, though PHMAs are discussed elsewhere. The discussion of threats to sage-grouse in the planning area is then followed immediately starting on page 362 by threats to sage-grouse in Management Zone 1 (MZ1). Knick et al. (2013) has been included as a reference and cited in text where appropriate. |
| DR-MTDK- | US Fish and Wildlife Service, | Federal Government | Chapter 4: The Chapter 4 effects analysis for GSG does not include: 1) clear metrics/effects indicators for each | The Impacts section has been improved and now provides clear indicators that will provide feedback from |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| SD-13-0046-4 | Terry Quesinberry | | action; 2) a consistently applied analysis framework across alternatives on which to base effects comparisons; 3) consistent effects determinations (adverse, beneficial, neutral, etc.) for each alternative action; and 4) supporting rationale for each effect determination. For these reasons, we were unable to clearly ascertain, understand, and evaluate effects to the GSG (whether adverse, beneficial, or neutral) associated with the various alternative actions. Such metrics, determinations, and supporting rationale should be included in the final effects analysis. We recommend that the effects analysis include the following for each relevant threat in the planning area (per the COT Report) and proposed action within each alternative: 1) determinations as to whether the proposed actions and conservation measures are consistent with conservation objectives as stated in the COT Report, and 2) discussion of the extent to which identified threats would be ameliorated. This discussion should also include a determination of consistency with the COT Report PAC designation. We have attempted such a preliminary consistency evaluation in the attached Matrix. However, many actions/measures in the Matrix were assigned a category of "unknown" (as to their consistency with the COT Report) due to a lack of clarity/specificity in the DRMP/EIS effects analysis and in knowing how BMPs and conservation/mitigation measures in various supporting appendices would be applied. | management actions. When possible, we have quantified these indicators. In all other cases we have used expert opinion or best available information. In the Assumptions section for Special Status Species impact we provide terminology related to effects. Determinations of effects will be featured more thoroughly in the Biological Assessment. There is a COT consistency table added to the Proposed RMP to show how threats to sage-grouse are addressed. We have evaluated the Matrix provided and have clarified and remedied areas of concern in the Final RMP/EIS. Concerns expressed in the Matrix referenced in the comment are also addressed directly in the response.<br><br>The Proposed RMP allows BLM the authority to make BMPs mandatory at the project level as a term or condition of approval or authorization. Sources and citations are included in text supporting the basis for projected impacts. |
| DR-MTDK-SD-13-0046-5 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | We recommend that Appendix M be edited to provide additional clarity as to how various BMPs from the different alternatives interact and are considered, which measures would apply to which actions under which circumstances and alternatives, and how they would ensure adherence to FRMP/EIS GSG purpose, need, goals, and objectives. We also recommend that, where | Appendix B addresses BMPs, and additional discussion is provided at the beginning of Chapter 2. The SD RMP allows BLM the option to make BMPs mandatory at the project level. BMPs apply to all the alternatives unless specified otherwise. Most of the BMPs are described in the Appendices rather than in the body of the RMP. The COT consistency table is included in the Proposed RMP, |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | possible, measures be edited to provide clear consistency with conservation measures and options be included in the COT Report. We also have concerns with Appendix M pertaining to compensatory mitigation as discussed below. | and NTT's recommended conservation measures are included primarily in Appendix V-1. Refer to Appendix B for a summary of BMPs and Appendix V-1 for conservation measures specific to sage-grouse. |
| DR-MTDK-SD-13-0046-6 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | COT Report Consistency: Our preliminary completion of the attached USFWS BLM RMP Alternative Review Matrix resulted in numerous "unknown" designations as to whether various proposed actions were consistent with the COT Report. This was largely due to: 1) the absence of direct discussion/analysis in the DRMP/EIS relating proposed actions to the threat amelioration and conservation objective consistency per the COT Report, and 2) lack of clarity in the applicability and intent of the GSG conservation measures in the various appendices, including Appendix V (now Appendix V-1). Clarification is required with respect to individual actions and predicted effects across all alternatives. | BLM has included a table to address the COT Threats in Chapter 4. |
| DR-MTDK-SD-13-0046-7 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Priority Protection Areas: The proposed PPAs in Alternative C include all the core areas of the COT Report PACs in the Planning Area, which we support. However, the other Alternatives exclude an important area of the PPAs recommended by the COT Report and the South Dakota Department of Game, Fish and Parks. Additionally, the difference in PPA boundaries between the alternatives and resulting differences in levels of protections for leks and potential threats to the GSG overall limits our ability to provide a thorough review. We recommend that the selected alternative be inclusive of all core areas or that clear rationale be provided as to how the exclusion of any core area is consistent with a plan intended to ensure adequate regulatory mechanisms. | The South Dakota BLM has adopted the sage-grouse core areas developed by the State/Game, Fish & Parks as the proposed RMP's PHMA. The new core areas encompass the PHMA proposed in Alternative C and include more acres than any of the areas developed for the Draft EIS alternatives. |
| DR- | US Fish and | Federal | Monitoring: It is unclear from the GSG monitoring | Appendix V-2 identifies the Sage-grouse Habitat |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| MTDK-SD-13-0046-8 | Wildlife Service, Terry Quesinberry | Government | section in Appendix W (now Appendix V-2) as to when implementation and effectiveness monitoring would be conducted and what methodology would be employed. This appendix should reference and adhere to the recently developed 2013 Draft U.S. BLM and USFS Greater Sage-grouse Monitoring Framework (and the Final Framework when completed). | Assessment Framework (Stivers et al. 2010) and the BLM Assessment, Inventory, and Monitoring (AIM) Strategy (Toevs et al. 2011) and the methodology therein as monitoring tools. |
| DR-MTDK-SD-13-0046-9 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Adaptive Management: We did not find detailed discussion of or a proposed approach for adaptive management application in the DRMP/EIS. The ability to adaptively manage and adjust action elements and conservation measures based on monitoring results is an important component of GSG conservation across the programs addressed in the DRMP/EIS and should be included in the FRMP/EIS. | The adaptive management language has been revised since the Draft EIS was released. Refer to the chapter 2 narrative section below Table 1-1. In the SD RMP, BLM has provided for flexibility and adaptive management to the extent practicable while maintaining clear, consistent management actions that can be evaluated for impacts. BLM can apply additional adaptive management measures at the project (implementation) level, and the SD RMP provides the direction for this to occur. If needed, BLM can amend or modify the SD RMP to address future changes that were not considered which may include adaptive management responses to changing conditions or new information. |
| DR-MTDK-SD-13-0047-1 | State of South Dakota | State Government | We acknowledge that the maps of the Sage Grouse Priority Protection Areas found within this document encompass lands where the BLM holds the surface or mineral rights plus buffering to avoid jagged edges. As a result of the buffering, state owned and private lands are included in the PPAs. This has raised some concerns that if sage grouse are federally protected, that these maps could serve as default maps for designating critical habitat and placing federal restrictions on nonfederal lands. On the other hand, South Dakota Game, Fish and Parks is currently working on the State's sage grouse management plan. The core area maps in the State's | The BLM only has regulatory authority on BLM surface and subsurface estates, but animals do not acknowledge human-delineated boundaries. The areas of sage-grouse PPAs delineated by BLM in South Dakota were based on the very same scientific studies tracking radio-marked sage-grouse used by Game, Fish, & Parks to develop their sage-grouse core areas. In addition to using actual sage-grouse locations from multi-year studies, BLM also used known lek locations (also used by GFP) and known sagebrush areas to define sage-grouse habitat. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | plan, although similar, differ from the PPAs in BLM draft plan because these maps will be tied to sage habitats | BLM adopted the core areas developed by the state as the Proposed Action. In the Final RMP/EIS. The state's core areas include all of the areas designated as PHMAs, and also include a greater area than what South Dakota BLM designated as priority for protecting sage-grouse in the Draft RMP/EIS. The newly developed core areas may strengthen BLM's case with US FWS that the protections afforded by BLM are sufficient to keep the sage-grouse from being listed. If the sage-grouse is listed, the US FWS will likely consider the areas defined by BLM and GFP, and including other landownerships, as important sage-grouse habitat because it has been identified as such using the best resources available by both agencies involved. |
| DR-MTDK-SD-13-0047-12 | State of South Dakota | State Government | Map 2-9, the big game winter range and sage grouse winter range maps are lumped together. We suggest that the sage grouse winter range and the big game winter range be placed on separate maps. | These maps have been modified as suggested. |
| DR-MTDK-SD-13-0047-2 | State of South Dakota | State Government | Should be noted that the core areas have recently been adjusted from the previous version shared with BLM during the drafting of this resource plan, we ask that BLM considers these new data in the final plan. These adjustments to the core areas now include small parcels of land that were previously excluded. Such adjustments make the core areas more in line with the scale of protection in western state core area maps. As a result, the State recommends that each BLM PPA map within this document denote that BLM PPAs are based upon buffered BLM surface and mineral estates and do not represent the actual sage grouse range maps in South Dakota. This will ensure that the BLM PPA maps do not conflict with those maps developed in the State Sage Grouse Plan under development nor be used as default sage grouse range maps. | BLM has adopted the new core areas developed by the State/Game, Fish & Parks as the sage-grouse PHMA for the Proposed Action in the Final RMP/EIS. The sage-grouse General Habitat Area will decrease because some areas that were General Habitat are now PHMAs. The RMP explicitly states in several places that BLM only has authority on BLM administered surface and subsurface estates but not on private or other landownerships. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0047-34 | State of South Dakota | State Government | On page 359, we recommend that the BLM identify the regulatory mechanisms that they are referring to regarding sage grouse. | South Dakota Game, Fish, & Parks has little regulatory power in terms of limiting industry and development impacts on wildlife and the text of the RMP has been revised to reflect this. |
| DR-MTDK-SD-13-0047-7 | State of South Dakota | State Government | On page 45, the RMP references No Surface Occupancy stipulations for occupied bighorn sheep range, areas within 1/2 mile of sage-grouse leks, and areas within 1/4 of raptor nests and 1/2 mile bald eagles and peregrine falcons nest. Please provide the citation for these distances. | Literature review was conducted at State Office level. The Montana/Dakotas State Office developed a set of stipulations which are recommended for adoption by the Field Offices based on their findings or recommendations from other sources. The basis for some of the stipulated buffers originated with guidelines provided by the US Fish and Wildlife Service (for the bald eagle in particular). Others originated from Montana Fish, Wildlife, & Parks management guidelines or South Dakota Game, Fish, & Parks management documents. Some stipulations and buffers differ from State Office recommendations based on local data and recommendations from SD Game, Fish, & Parks. |
| DR-MTDK-SD-13-0047-9 | State of South Dakota | State Government | On page 57, the RMP references a 7 year occupancy. We suggest that the BLM explain what this means. On page 58, there is a No surface Occupancy stipulation of 1 mile for sage grouse leks but page 45 lists the stipulation as 1/2 mile. Is this a typo? If not, please explain the difference. | Page 57 in Table 2-1 now includes a note defining what is meant by "years of past nest occupancy". The discrepancy between stipulations on pages 58 and 46 do appear to be a typo and were updated in the FEIS. |
| DR-MTDK-SD-13-0048-16 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 101- In mgmt 27, please justify the assumption that resource conflicts are an automatic condition in PPA's and therefore CX's are precluded. | Sage-grouse are a BLM sensitive species and have been proposed for listing under the Endangered Species Act because of current threats to habitat and lack of regulatory mechanisms in place to protect sage-grouse and their habitat. For this reason, sage-grouse and their habitat are considered a high resource value in need of protection. BLM does not utilize a categorical exclusion in these cases and conducts an environmental review of proposed actions through a more detailed environmental assessment or in some cases an environmental impact statement. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0048-30 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 1146 - We again comment and request that the map on this page clearly convey that ONLY the BLM lands on this map can be designated as either Priority or General grouse habitat. Absent this clarification, the public will assume that private and State lands on this map are classified in the same manner as are the BLM lands. It is our understanding that owners of private lands on this map have not agreed to have their lands classified the same as BLM lands. | The RMP explicitly states several times that all regulations and management actions of the BLM are specific only to BLM administered surface and subsurface estates. The boundaries of sage-grouse priority and general habitat areas, as well as all other wildlife related boundaries, are determined as much by the individual species and its habitat as by this agency. In an effort to prevent the sage-grouse from being listed, developing core areas, or PPAs, for sage-grouse was necessary. The maps will continue to reflect, as accurately as possible, the habitats important to sage-grouse. |
| DR-MTDK-SD-13-0048-33 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 1158 - We comment that the BLM should consider on a site by site basis, the utility of placing conservation measures for grouse conservation on BLM lands if it is unable to determine if those conservation measures on just the BLM portion of the allotment would actually contribute to the a Decision by the U.S. Fish and Wildlife Service in 2015 to not list the grouse. | BLM has pointed out both at the Management Zone level and the National level those actions that would not be practical and those actions including actions well suited for great basin but not likely to work in the Great Plains. This information has been considered and reflected in the recommendation provided by these teams. The teams including the FWS have been briefed and are aware of the difficulties of applying management approaches across a wide variety of landscapes with different conditions. The BLM must consider sage-grouse habitat as a whole when identifying appropriate stipulations. Site-specific changes and decisions may occur on a project-level basis. |
| DR-MTDK-SD-13-0048-7 | Butte County Commissioners, Kim W Kling | Local Government | Starting at the top of Pg. 1158, is there a BLM acreage size criteria for when the remaining narratives in Appendix V (now Appendix V-1) apply? It appears that there are a number of allotments within the RMP area designated by the BLM as Priority Sage grouse Habitat with very few BLM owned acres. The RMP should include a Table that shows which grazing allotments meet specific identified minimum criteria that would elevate them for attention by the BLM on grouse | Appendix V-1 would apply to any grazing allotment within general habitat including those with limited BLM surface acres. Unless a certain practice or measure states that it is applicable only in PPAs, practices and measures in Appendix V-1 would apply to all allotments within general habitat shown in Map 2-5. Grazing Allotments are shown in Map 2-2-11 through 2-14. |

**Table W-8**
**Comments Related to Greater Sage-Grouse**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | mitigation or conservation measures. | |
| DR-MTDK-SD-13-0050-1 | Moreau Grazing Association -Jim Johnson | Individual Consumer | Sage-grouse plans and initiatives are fine but they will not bring sage-grouse back if predators are not controlled. | BLM has addressed the role of predators and their impact on sage-grouse in Chapter 3. |

**Table W-9**
**Comments Related to Lands and Realty**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0008-2 | Dakotas Resource Advisory Council, Kevin Forrester | Association | Additionally the BLM should try to work with Weber family to acquire the small sliver of property that lies just beyond the west boundary of the FMRA . This acquisition would promote the protection of visual resources and allow public access to the summit of Mount Meade. | Thank you for your suggestion and your comments. |
| DR-MTDK-SD-13-0011-35 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Exchange would be the preferred method of land adjustment; all exchanges must be within South Dakota.<br><br>SD IWLA vigorously disagrees with this proposal! SD IWLA believes that land exchanges, are the only acceptable way to achieve continuity and land management effectiveness. South Dakota does not have an abundance of public lands and any net loss of those lands represents lost natural resource and recreational opportunity. SD IWLA does not object to the outright sale of lands in the inventory as long as the proceeds of that sale are immediately applied to the purchase of lands that are of equal size and equivalent or better natural resource value. A net gain in acreage and habitat value is preferred but no net loss is likely the most reasonable result of land exchanges. SD IWLA would suggest that land acquisitions outside of South Dakota should be considered only when the proposed acquisitions rest on the borders of the state and would further block up critical habitats and wildlife movement corridors and protect critical PPA's or ACEC's. | Congress did not give the BLM in South Dakota the tools needed to bank funds from land sales; South Dakota was not included in the geographic area covered by the Federal Land Transaction Facilitation Act of 2000 (FLTFA). While land exchanges are the preferred method of adjusting BLM land patterns, the need for management efficiency and the need to satisfy public demand will influence the quantity of lands involved in direct disposal. |
| DR-MTDK-SD-13-0011-8 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The SD IWLA is concerned that potential wind development, installation of energy corridors, power lines and towers are not properly or effectively addressed in the alternatives | A discussion of energy corridors is included in chapter 3 rights of ways (lands) and wind energy sections. BLM has received no proposals to create a major energy corridor(s) in SD and does not manage sufficient land in SD to be in a position to propose a major energy corridor. Power lines and wind towers are addressed in Chapter 2 (Alternatives), Chapter 3 and Chapter 3. This |

**Table W-9**
**Comments Related to Lands and Realty**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | information can be found in the special status species section and in the lands and renewable energy section of each chapter. These items are also addressed in the BMPs in Appendix B and in the oil and gas lease stipulations in Appendix E1-E4. Areas open, excluded or avoided for ROWs are addressed in the summary of Alternatives in Chapter 2 and shown in Maps 2-15 through 2-19. Areas open, excluded, and avoided to wind energy development are discussed in the summary of alternatives in Chapter 2 and shown in Maps 2-19- 2-23. Wind tower siting guidelines are described at the end of Appendix B. |
| DR-MTDK-SD-13-0017-2 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please provide a map or amend map(s) to show the National Cemetery, in relation to BLM lands and please discuss any attempt to transfer BLM property near the Cemetery to others and any actions that will be engaged in with respect to managing BLM property to assist with management and visual quality and sound scape of the Cemetery. | The National Cemetery is discussed on pages 769 and 770. Such an action would be further addressed, with maps, at the project level, in an environmental assessment. BLM can transfer lands for purposes such as the expansion of the National Cemetery. See pages 160 through 171 for measures which influence management of visual quality and the sound scape of the area of interest. |
| DR-MTDK-SD-13-0020-1 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | ELF Waves,<br><br>Please discuss the debate among scientists over whether there is a risk (or no risk) from ELF radiation. Please discuss the relationship of your transmission line corridors to people's houses (discuss the distance from line corridor to houses), especially higher density developments and any potential mitigations to avoid transmission lines being placed directly over high density population areas or directly over houses of concerned folk who might object to that. | Household residences are located on private lands which are not addressed in the decision space for the SD RMP/EIS. |
| DR-MTDK-SD-13- | State of South Dakota | State Government | On page 98, the RMP references land disposal and retention. What is the BLM's plan for land disposals? | Most lands would be retained in public ownership. Tracts of land that are difficult to manage because of location, lack of access or other characteristics may be |

**Table W-9**
**Comments Related to Lands and Realty**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| 0047-16 | | | | considered for disposal pending project level environmental review. Land disposal and retention is discussed in the Lands and Realty sections of Chapter 2 of the Proposed RMP (Table 2-2) and in the Narrative section of Chapter 2. A map of retention and disposal areas in shown in Map 2-2. Criteria for land ownership adjustments are shown in the Appendix I. |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0004-5 | Black Hills Multiple Use Coalition, Tom Troxel | Association | The BHRMUC requests that the RMP require notification to lessees in regard to oil and gas exploration and development on BLM surface lands and the same for surface users where BLM holds mineral rights. The exploration of oil and gas has significant impact on natural resources and livestock management decisions, including disturbance of animals from increased traffic, dust from traffic and drilling, and access to water. The RMP should require specific notification methods, timelines and information to be provided to lessees and/or surface owners. | The posting of Notices of Staking and Applications for Permit to Drill is the method of notification to the general public as required by law. Within the last few years, written notification to split estate surface owners, of proposed oil and gas leasing, has been required. BLM engages the public and other surface users when actions are proposed that are subject to environmental review under NEPA regulations. |
| DR-MTDK-SD-13-0009-2 | Linda Gilbert | Individual Consumer | Oil and Gas Leasing: There is no inclusion of notification of leasing for oil and gas exploration to the lessees. | A provision has been implemented in the last several years to notifying the surface owners of split estate lands when the minerals on such properties are slated to be leased for oil and gas. No such provision is required to notify grazing lessees, however the BLM engages the public and other surface users when actions are proposed that are subject to environmental review under NEPA regulations. |
| DR-MTDK-SD-13-0011-5 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA is concerned that current survey, monitoring and inventories of wildlife and habitats are inadequate to inform management over the life of the plan as required by 40 CFR 1502.22: It seems clear that both historical and current data regarding the impacts of livestock grazing and energy development, (two monumental issues that promise to impact natural resources in the future) are missing. If these data are available, they need to be incorporated into the plan and if not available, the BLM needs to be fully transparent and state the same. SD IWLA submits that the BLM is required to include a summary of existing credible scientific evidence which is relevant to the evaluation of reasonably foreseeable adverse impacts. | The BLM has and does use data regarding energy development and its effects on wildlife. Not all studies have been conducted in the immediate vicinity of BLM lands in South Dakota, but results from studies conducted across the west have been used to inform the decisions presented in the RMP. The same is true for grazing. There is monitoring conducted regularly within the planning area to evaluate rangeland and riparian health and thus the health of wildlife habitats. In spite of the data BLM does possess, there will always be a dearth of some information and BLM must use the best available data. Filling information gaps is a continuous process and leads to adapting management decisions as new information becomes available. Monitoring wildlife has long been in the hands of state wildlife |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | management agencies; thus, monitoring and obtaining data becomes a cooperative process, the adequacy of which depends on multiple parties. |
| DR-MTDK-SD-13-0015-26 | Public Lands Advocacy, Claire Moseley | Consumer Group | BLM has failed to provide any scientific data which has examined the effects the existing 43 active oil and gas wells in core sage-grouse habitat are having on lek attendance and habitat quality. Has lek attendance dropped since establishment and operation of these particular wells? How do broad trends in lek attendance compare to trends at leks near the 43 wells? Rather than relying on published information from other areas in Management Zone 1 (MZ1), which may or may not be similar to the planning area, it is essential for BLM to examine specific data directly related to the planning area. Data for lek attendance needs to be presented in this RMP/EIS to allow for independent analysis of trends. | Sage-grouse in South Dakota have been in decline just as they have been in other parts of their range. It has been shown in multiple studies that have been peer-reviewed and published in scientific literature that oil and gas development and sod-busting negatively affect sage-grouse. Monitoring and studies will be ongoing to better inform management decisions. |
| DR-MTDK-SD-13-0017-1 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Below the Fort Meade area there is a very small piece of property that you have mineral jurisdiction on. This piece might abut or be near the National Cemetery (or not). If below-surface minerals development near Cemetery could affect the peace or appearance of the Cemetery, you should provide restrictions/exclusions for any proximal area on oil and gas Development, locatable and leasable minerals. If you have surface rights outside of the Fort Meade area near Cemetery, similar considerations are needed for other values. | All BLM managed surface with minerals, in the area described, are within the Fort Meade Recreation Area boundary. Some nearby federal surface with minerals, fitting the description, are managed by the U.S. Forest Service. The closest BLM managed minerals under private surface, outside of Fort Meade are 80 acres 1.5 miles west-northwest of the cemetery, which could partially or fully be protected from surface occupancy by Management Actions 12 and 13 on page 133. Another federal mineral parcel, under private surface, is 1.5 miles SSE of the cemetery, and would not be affected by this provision. |
| DR-MTDK-SD-13-0023-5 | South Dakota Stockgrowers Association, Silvia Christen | Association | SD Stockgrowers requests that BLM include detailed requirements for notification to lessees in regard to oil and gas exploration and development on BLM surface lands and the same for surface users where BLM holds mineral rights. The exploration of oil and gas has significant impact on natural resources and livestock | The posting of Notices of Staking and Applications for Permit to Drill is the method of notification to the general public as required by law. Within the last few years, written notification to split estate surface owners of proposed oil and gas leases has been required. BLM engages the public and other surface users when actions |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | management decisions. Things like disturbance of the animals from increased traffic, dust created from traffic and drilling , water access and quality and land used for well sites have significant impact on livestock operators. BLM's RMP should require specific notification methods, timelines and information to be provided to lessees and/or surface owners. | are proposed that are subject to environmental review under NEPA regulations. BLM provides grazing lessees general information about oil and gas leasing activity in range newsletters. |
| DR-MTDK-SD-13-0027-23 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Unfortunately, alternatives considered for the SDRMP have lek buffers of 0.25 mile to 1.0 mile; this corresponds to a 4 to 10% probability of lek persistence. By comparison, the NTT report recommends a 4-mile lek buffer for siting industrial development in sage-grouse habitat (SGNTT 2011), a prescription in greater accord with the science. These lek buffers should be applied to both PPAs and General Habitat as an added protective measure against the possibility that prior existing leases will experience development inside PPAs.<br><br>Under Alternative A, a ¼ mile buffer would be provided for leks. DEIS at 636. We assume this applies to PPAs and General Habitat equally, but the EIS is ambiguous on this point. Please clarify. BLM states this would "protect nesting habitat within that ¼ mile" • (DEIS at 636), and "eliminate short-term direct impacts and long-term indirect impacts associated with oil and gas leasing in small areas around sage-grouse leks..." •<br><br>Under Alternative B, outside PPA areas, ½ mile NSO stipulations "would protect the nesting habitat within that area." • DEIS at 647. These are false statements based on the state of scientific knowledge related to impacts to sage grouse from oil and gas development, because the impacts of drilling extend 3 miles from the wellsite, and impacts from production-related activities extend 1.9 miles from the wellsite (Holloran 2005). BLM notes | Alternative A of the Draft RMP/EIS includes current management only which does not identify or provide restrictions in PPAs. The 1/4 mile buffer on page 636 would apply to all areas. The statement that Alternative B would protect habitat in this area means only habitat within the 1/2 mile area; not all habitat. Clarification was added to the Final RMP/EIS to better explain the protections afforded by each buffer and stipulation. BLM considered many studies and developed the alternatives to provide varying degrees of protection so that a range of alternatives were considered in accordance with NEPA. The majority of leks are within PPAs which have NSO protections for the entire PPA. To address concerns of buffers sizes around leks outside of PPAs, a 4 mile timing limit would apply to oil and gas activities in general habitat. BLM's ability to regulate oil and gas activities is limited on the leks outside of PPAs because most of the land around these leks is in private or state ownership. BLM will coordinate with GFP to address management in these areas and will include new information provided by GFP. The PPA boundaries may be changed based on new information including the discovery of new leks. BLM cannot apply stipulations to leases that predate the RMP (areas that are already leased and producing). |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | negative impacts to sage grouse lek populations from wells sited as far as 7.6 miles from the lek (Tack 2009, DEIS at 660). Some researchers have found the area of effect to be even greater. Taylor et al. (2012) concluded that "For oil and gas development, the signal is strongest within a 12.4-mi (20-km) radius of a lek, and it is much stronger at this radius than at any smaller radii." • Thus, siting a well within ¼ mile of a lek would result in disturbance impacts that extend throughout the entire quarter-mile buffer, and birds nesting within this buffer would be negatively impacted, with the same result for a ½ mile buffer. BLM's own analysis from literature review subsequently supports our contention. DEIS at 637. The impacts analysis should be amended to correct this erroneous conclusion. We do support BLM's recognition that Alternative A "could result in extirpation of sage-grouse" • from parts of the planning area. DEIS at 637.<br><br>Under Alternatives C and D, NSO stipulations would apply to land within one mile of active sage grouse leks. DEIS at 42, 668. This represents an inadequate level of protection. Holloran (2005) documented that the existence of a producing well within 1.2 mile of an active sage grouse lek led to lek population declines. South Dakota data indicates that 97% of sage grouse nested within 4.35 miles of leks, while 32% nested farther than 1.86 miles from the lek site. Sensu DEIS at 658. Even Harju et al. (2009:443) found that "a general pattern was apparent whereby infrastructure within smaller radii (=1.6-2 km) [1 to 1.25 miles] encircling leks was associated with 35-76% fewer sage-grouse (depending on radii and study area) compared to leks at which no infrastructure occurred within these radii." • BLM recognizes this in its analysis under the Preferred | |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | Alternative, stating this one-mile buffer "would not address long-term indirect impacts to sage-grouse from activities that would occur outside the timing restriction since local studies showed 62 percent of the time they were within 12.98 miles of lek sites (Kaczor 2008)." • DEIS at 668.<br><br>BLM correctly cites to science indicating that lek buffers of 0.25 mile, 0.5 mile, 0.6 mile, and 1.0 mile result in predicted lek persistence of 5%, 11%, 14%, and 30% respectively, versus 85% for leks in the absence of development. DEIS at 649. WGFD estimates are even lower, at 4, 5, 6, and 10%, respectively (Christiansen and Bohne 2008). Even a 70% probability of lek abandonment is an unacceptably high risk of failure, and BLM should apply NSO buffers of not less than two miles in combination with Timing Stipulations restricting drilling during the period of habitat occupancy to apply as Conditions of Approval (COAs) to existing leases that pre-date the RMP revision. BLM points out that existing leases would undermine sage grouse protections in areas of high and moderate mineral potential. DEIS at 657. This effect would be lessened with the applications of COAs as described in these comments. | |
| DR-MTDK-SD-13-0027-26 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | If No Surface Occupancy is allowed, do the timing stipulations apply to previously existing developments that pre-dated the NSO stipulations? | Oil and gas lease provisions apply to a lease through the life of the lease, including mineral production extending the holding period of a lease, even if a new land use plan would provide new stipulations relating to oil and gas. These new stipulations would normally only apply to new oil and gas leases. |
| DR-MTDK-SD-13-0029-3 | World Wildlife Fund, Martha Kauffman | Wildlife Association | In order to ensure the protection of disturbance-sensitive areas, such as sage-grouse priority areas or riparian and wetland habitats, no waivers, exceptions or modifications should be allowed for those areas when the BLM | Waivers, exceptions, and modifications (WEMs) sometimes become necessary when a resource is not present, or will not be impacted by an action. Through the RMP planning process, the public is allowed to |

**Table W-10**
**Comments Related to Leasable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | identifies a No Surface Occupancy stipulation to ensure the regulatory certainty of protection. If waivers, exceptions and modifications are allowed, then the BLM should set up a process that allows the public to comment when these are actions considered. | comment on each proposed waiver, exception and modification described in Chapter 2, Table 2-2 and Appendix E-1 - E-4). At the project level, WEMs would be applied according to procedures established by BLM. An exception, waiver, or modification must be based on one of two criteria. According to 43 CFR 3101.1-4, "A stipulation included in an oil and gas lease shall be subject to modification or waiver only if the authorized officer determines that the factors leading to its inclusion in the lease have changed sufficiently to make the protection provided by the stipulation no longer justified or if the proposed operations would not cause unacceptable impacts." |
| DR-MTDK-SD-13-0029-8 | World Wildlife Fund, Martha Kauffman | Wildlife Association | The BLM should update the surface and subsurface acreages (in several places including Table 2-1 and BLM Fact Sheet-Oil and Gas Development) to clarify how many unleased acres the stipulations would be applied to and thus have those protections. The BLM should also consider upon expiration or termination of existing leases, to not accept nominations/expressions of interest for parcels within priority areas. | Figures of leased minerals are constantly changing. We have a snapshot of leased and unleased federal minerals in Figure 3-16, page 424. Upon expiration of existing leases, provisions of the new land use plan would be implemented. |
| DR-MTDK-SD-13-0047-40 | State of South Dakota | State Government | On page 459, the RMP mentions that oil is produced in Harding, Custer, and Fall River County but SD DENR website also mentions Dewey County. Why is this different? | Dewey County and Meade County have wells but, they do not have production listed for them; at least for 2012. Production can be shut in for a time for quite a number of different reasons, such as low prices, maintenance needing to be done, bankruptcy, lack of pipelines, etc. |
| DR-MTDK-SD-13-0047-45 | State of South Dakota | State Government | On pages 595 and 629, the RMP assumes that future oil and gas developments will be similar to current developments. We suggest adding the citation where this information was acquired. | A citation for the Reasonable Foreseeable Development Scenario for Oil and Gas Activities on Bureau Managed Lands in the South Dakota Study Area, October 7, 2009, BLM Wyoming State Office, Reservoir Management Group is on page 475, and is in the bibliography. |

**Table W-11**
**Comments Related to Locatable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0005-3 | Jace DeCory | Individual Consumer | In this document, it appears that the BLM deferred to the Nuclear Regulatory Agency as the lead agency regarding the Dewey-Burdock uranium project in the southern Black Hills. Some comment should be included regarding the current controversy regarding the proposed water permit and project application for the Powertech company, as there are a number of folks who are in opposition to this permit. Water is precious and the BLM should also be concerned about aquifers and potential environmental hazards with this proposed uranium project, of which some lands are under the federal jurisdiction of the BLM. | This is addressed in Chapter 3, Minerals, Locatable Minerals, Page 432. |
| DR-MTDK-SD-13-0027-6 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | According to the original mining regulations, "Unnecessary or undue degradation means impacts greater than those that would normally be expected from an activity being accomplished in compliance with current standards and regulations and based on sound practices, including use of the best reasonably available technology." • 43 C.F.R. § 3802.0-5(l) (emphasis added). In the South Dakota RMP EIS, BLM has failed to uniformly apply in its Preferred Alternative the recommended sage grouse protections presented to it by its own experts (the BLM National Technical Team), and as a result development approved under the alternatives analyzed will result in both unnecessary and undue degradation of sage grouse Core Area habitats and result in sage grouse population declines in these Core Areas, undermining the effectiveness of the Core Area strategy as an Effective Conservation Effort in the context of the decision whether to list the sage grouse under the Endangered Species Act. | BLM has considered the recommendations from the NTT and has worked closely with the sage-grouse Rocky Mountain Team and the NTT to include their recommendations in the RMP. BLM has very limited discretion in regards to the mining laws. BLM has evaluated a closure and withdrawal of all minerals in PHMAs in Alternative C of the RMP/EIS. Even with a withdrawal of minerals, the effectiveness of such actions would be limited as most moderate to high potential areas are already claimed. |
| DR-MTDK-SD-13- | The Wildlife Society, Silka Kempema | Wildlife Association | This alternative needs to have the "ACEC" • removed to be consistent with the Special Designations Section; Alternatives Specific to the Greater Sage-Grouse | The reference to "/ACEC" has been removed on page 149. Acres for PPAs are under 2-2. Wildlife; Special Status Species; Greater Sage-Grouse General Habitat. |

**Table W-11**
**Comments Related to Locatable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| 0028-20 | | | Protection Priority Areas (PPAs) ACEC, Preferred alternative that states "No ACEC designation of Greater Sage-Grouse PPAs." • | |
| DR-MTDK-SD-13-0047-42 | State of South Dakota | State Government | On page 473-4, the RMP mentions gold and silver mining. How is the BLM going to address the current pegmatite, shale, and gypsum mining? | A location is not given for the referenced mining operations. Since BLM does not have any current pegmatite, shale or gypsum mining currently ongoing, the operations referenced are likely on USFS lands or private lands. Pegmatites are generally deeper in the core of the Black Hills, and gypsum is generally just beyond the "racetrack" just outside of the Black Hills. Shales would tend to be in the outer Black Hills. If such mining were to occur on BLM lands it would be addressed through standard procedures. A Plan of Operations would be required of the proponent to address the impacts including the risks and hazards associated with the project. Project level environmental review would be completed to assess the impacts of the proposed project. |
| DR-MTDK-SD-13-0049-01 | Continental Resources | Individual Consumer | Concerned that of 26 tracts they had nominated for leasing, all have been deferred because of sage-grouse and tribal concerns. In leased areas, Applications for permit to drill (APD) are delayed because of the on the ground coordination with tribes that BLM is currently doing. Will this continue? | The actions outlined in the Alternatives identify lands that could be leased, leased with stipulations, or not leased because of concerns about impacts to sage-grouse habitat. Refer to Maps 2-3 through 2-5.<br><br>In regards to tribal interests; sacred sites are present on or near the tracts that were deferred because of tribal concerns. BLM is working with the tribes to better identify specific areas in the deferred areas to determine which tracts could be leased without adversely impacting the tribes. This decision will be made at the implementation (project) level. For APDs in areas already leased, BLM would continue to coordinate with tribes if the tribes identify sacred sites or potential sites that need to be evaluated further. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0004-1 | Black Hills Multiple Use Coalition, Tom Troxel | Association | We urge the BLM to analyze a wider range of alternatives for the Greater Sage Grouse. The proposed RMP is based solely on the 2011 National Technical Team (NTT) report that is currently being disputed for its findings that would lead toward further land-use restrictions and its lack of supporting data based on scientifically acceptable methods and data. The BLM's blanket acceptance of the NTT report does not take into consideration the unique characteristics of the land in the Dakotas, which is on the fringe of the GSG area and is considered poor GSG habitat. | One of the factors the US FWS determined as contributing to sage-grouse being warranted for listing was lack of appropriate regulatory mechanisms to protect sage-grouse. Therefore, in light of the pending listing decision for sage-grouse, feasible alternatives must include sufficient protections to ensure that sage-grouse will not continue to decline. In addition to guidance from the NTT, BLM incorporated findings from scientific literature and, in some cases, expert opinion of those with knowledge specific to the South Dakota planning area. The South Dakota BLM recognizes that sage-grouse and sagebrush habitat in the planning area does not resemble sage-grouse and sagebrush in the Great Basin and has tailored its management of sagebrush and sage-grouse accordingly.<br><br>The data used in the NTT is peer-reviewed and widely accepted in the science and conservation communities. The BLM used the NTT report as well as local studies, data, and expert opinion to formulate the decisions contained in the RMP/DEIS. One of the factors the US FWS determined as contributing to sage-grouse being warranted for listing was lack of appropriate regulatory mechanisms to protect sage-grouse. Therefore, in light of the pending listing decision for sage-grouse, the only feasible alternatives must include sufficient protections as to convince FWS that sage-grouse will not continue to decline. In addition to guidance from the NTT, BLM incorporates findings from scientific literature and, in some cases, expert opinion of those with knowledge specific to the South Dakota planning area. The South Dakota BLM recognizes that sage-grouse and sagebrush habitat in the planning area does not resemble sage-grouse and sagebrush in the Great Basin and has tailored its management of sagebrush and sage- |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | grouse accordingly. |
| DR-MTDK-SD-13-0006-1 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The plan should clearly document its analysis of the NTT report recommendations. | The NTT recommendations were carefully reviewed and included in the SD RMP. |
| DR-MTDK-SD-13-0006-2 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The MMCAs were purportedly used in the RMP and EIS process as a tool to help develop management alternatives (MMCAs 1153). However, it is unclear how they influenced alternative development in the plan. The SD DRMP/EIS should clearly document is "hard look" • analysis of the NTT report recommendations in the plan as directed by the Washington Office (BLM Memo 2012-044). | BLM has carefully considered the NTT report and included all recommended actions in the range of alternatives and has completed a crosswalk of recommendations and SD RMP actions to ensure consistency.<br><br>Management Common to All Alternatives (MCAA) were used to simplify and describe those actions that would be applied to all alternatives (compared to other actions that apply to only one alternative). Rather than list each action in each alternative, a Management Common to all Alternatives is used so the reader understands that this type of action applies to all of the Alternatives. This was used in many cases to bring the document in compliance with the NTT recommendations. Refer to Special Status Species section in Chapter 2. |
| DR-MTDK-SD-13-0006-3 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The SD DRMP/EIS declined to separately analyze the Sage-Grouse Recovery Alternative (www.sagebrushsea.org/land_recovery_alternative.htm), a management alternative submitted by conservation organizations to conserve and recover sage-grouse populations. The SD DRMP/EIS contends that components of the "conservation groups alternative" • were determined to be substantially similar to the actions and habitats considered in the range of other alternatives analyzed in the plan (47). The Sage-Grouse Recovery Alternative, though based on the NTT report recommendations, makes additional and stronger | The range of alternatives in the Final EIS is adequate; analyzing a new alternative would not provide any added benefit. The NTT report recommendations were carefully followed. It is a goal of BLM to conserve sage-grouse (via habitat management) to the extent practicable. BLM is a multiple use agency that is required to manage for resource uses that are sometimes in conflict with the most ideal wildlife conservation scenarios. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | management prescriptions for a number of land uses and related effects in sage-grouse range, including livestock grazing, vegetation management, invasive plants, and fire management. These recommendations were not analyzed together or individually in the DRMP/EIS. Moreover, given that sage-grouse populations may continue to decline under the range of alternatives considered in the SD DRMP/EIS (see Table 1 in these comments), the BLM should analyze the complete Sage-Grouse Recovery Alternative as a possible strategy to conserve and restore sage-grouse populations and potentially preclude the need to list the species under the ESA (a goal of the SD DRMP/EIS (xiii)). | |
| DR-MTDK-SD-13-0011-12 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | In terms of greater sage grouse recovery efforts and prevention of ESA listing, the SD IWLA recommends that;<br><br>* PPA descriptions include breeding, brood rearing, foraging, and winter range and connectivity corridors. Primary and secondary habitats must be contiguous and large enough to achieve the goal of enhancing habitat and increasing sage grouse distribution to historical levels consistent with regional stability statistics.<br><br>* Primary and secondary habitats must receive full protections for large scale disturbances such as energy developments, wind generation, and power distribution lines and corridors that research has shown to be detrimental to historical population densities and distribution levels.<br><br>* In the event that habitats cannot be fully protected from energy development due to existing rights, ROW's or leases, impacts from the activities should be minimized by restricting disturbance to less than 20 acres per section | Where possible, these actions are included in the range of alternatives for the SD RMP. These actions are covered to a great extent in the Chapter 2 Special Status Species Section and in Appendix V-1. Also refer to Maps 2-4 through 2-6 for sage-grouse protection areas.<br><br>Some items cannot be fully addressed because BLM manages mostly small tracts of land intermingled with other state and private lands and cannot impose restrictions on these lands.<br><br>BLM cannot authorize large scale direct mineral buyouts through the RMP process. Retirement of mineral rights and grazing leases are difficult to implement as most lease holders want to retain the value associated with the right or lease. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | and parcels must be separated by not less than .8 of a mile.<br><br>*Increase the amount of protected habitat by negotiating fluid and surface mineral retirements, voluntary grazing permit retirements on temporary scales not to exceed 10 years where beneficial, mineral withdrawals, coal, uranium and surface mineral unsuitability findings, and direct mineral claim buyouts.<br><br>* Reduce overall road densities with travel planning and strictly regulate mineral and oil and gas (O&G) activities to consolidated access whenever possible to improve habitat functions and reduce conflicts with habitat connectivity and seasonal wildlife movements. See the NTT recommendations.<br><br>* Establish and maintain primary habitat (particularly special status species habitats) exclusion areas when considering new ROW permits. The BLM should consider management applications and alternatives that include strict interpretations of the NTT Report which incorporates the following recommended improvements to NTT recommendations:<br><br>*Avoid sage brush reduction treatments for the purposes of livestock or big game wildlife allocations and include practices that restore high quality habitat in areas compromised by invasive and non-native plant species.<br><br>* Implement range management practices consistent with NRCS and NTT guidelines that include avoiding new range and water developments, reduction in sage brush understory vegetation density and diversity, | |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | *Develop fire response plans that attempt to immediately extinguish fire in sage steppe habitat and design fuel treatments in sage steppe habitat in a manner that minimizes harm and disturbance to sage brush habitat and its integrity. | |
| DR-MTDK-SD-13-0011-14 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The BLM should implement thorough resource monitoring practices that facilitate timely adaptive management. Each process should be based upon a complete set of performance standards that include thresholds for application of adaptive management strategies. Suggested thresholds could include wildlife (sage grouse in particular) population density goals, reproduction/recruitment minimum indices, geographic measurements of surface disturbance, oil and gas well densities and distributions etc. In all cases, monitoring standards should be comprehensive, ongoing and statistically capable of defining accurate trends | BLM conducts monitoring and provides general direction for monitoring of resources in the resource-appropriate portions of the RMP and its appendices. BLM monitors habitats but not generally wildlife populations as this is the responsibility of state wildlife agencies. |
| DR-MTDK-SD-13-0011-15 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The discussion of mitigation in the plans alternatives do not appear in sufficient detail to ensure that environmental consequences are objectively and fairly evaluated. NEPA requires that the BLM discuss mitigation measures in sufficient detail to show that such measure will reduce environmental impacts to insignificant levels. Simply identifying mitigating measures without fully analyzing and reporting their effectiveness seems to be antagonistic to NEPA guidelines. Similarly, generalized statements that BLM will conduct monitoring are inconsistent with NEPA mitigation requirements. Periodic surveillance of a resource in anticipation of environmental damage is not a viable substitute for compensatory mitigation. Neither should acceptance of research funding be substituted for on the ground mitigation. | All concerns brought up in the comment have been addressed in Chapter 2 as well as at the beginning of each section in Table 2-2. The Appendices also feature various forms of mitigation. In particular see Appendices A through D, and Appendix V-1. Appendix E contains stipulations for Oil and Gas development. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | Mitigation should require a comprehensive net benefit to resource values as a result of negative environmental damage. Any loss or damage to resources or their values on a management site should be compensated by the addition and protection of equivalent or better resource values off site. In particular, greater sage grouse and other sensitive species conservation and mitigation efforts should be designed and fully monitored in such a way that their effectiveness can be measured in terms of net benefits to the species as well as the habitat. Mitigation should always prioritize avoidance and/or minimization of impacts and mitigation actions should generate net conservation benefits consistent with the National Sage Grouse Planning Strategy. There can be no net loss of either population or habitat but there should also be net gain in habitat quantity and quality to accomplish the primary goals of restoring sage grouse to some historic level in order to avoid a FWS ESA listing decision. BLM must demonstrate leadership in restoring sage steppe dependent species to the landscape in order to fulfill organizational planning goals. | |
| DR-MTDK-SD-13-0011-16 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The BLM and respective Federal agencies should consider options to further sage grouse and habitat conservation efforts on private land through cooperation, communication, collaboration and adoption of responsible uniform standards and practices. We strongly recommend that the BLM integrate with private land conservation benefits provided by the NRCS such as EQIP and Sage Grouse Initiative (SGI). There are far too many differences and disparities in federal land management philosophies, principles and guidelines to provide cogent and effective on the ground management to improve habitats and conditions for wildlife, agriculture and general environmental quality on either public or private lands. In contrast, the SD IWLA | It is very true that for conservation efforts to have greatest effect the efforts must not be disparate across jurisdictional boundaries. BLM has no jurisdiction and can enforce no rules on private lands. NRCS and non-profit conservation organizations are great allies when it comes to extending conservation practices beyond federal lands, but because of differences in mandates, mission statements, etc., it is not always possible to seamlessly align management. Some differences are inevitable, and the RMP is not the place to set out how the BLM will streamline itself with other federal agencies. That said, the BLM will continue to work with private landowners who lease federal surface lands to ensure healthy lands. BLM will also continue to |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | believes there are some agency practices and policies that actually cancel one another out thereby causing confusion, compromising environmental conditions and their own variety of ecological damage. BLM has the opportunity, with this planning effort, to design and follow through with conservation strategies that account for cross jurisdictional issues and philosophies. Secondly, the SD IWLA believes that the simplest and most cost effective first step in conservation is to halt historical land management applications and activities that have led public and private lands to their present condition classes. Doing the same things repeatedly, perhaps to lesser or greater degree, with an expectation of achieving a different result approaches the definition of insanity. Management paradigms and traditional practices must yield to innovation and new approaches under the realization that past management has had a lasting, cumulative effect on the landscape for which we now search for remedies. It is overly obvious that past management strategies and measures have failed to subdue the descending trend in sage grouse numbers and habitats across the range and robust, mandatory management strategies based upon the best available science are essential to reverse the trends. Lastly, SD IWLA believes there is great value and purpose in considering the Framework for Mitigation of Impacts from Infrastructure on Sage grouse and Their Habitats published by the Sage Grouse Mitigation Subcommittee of the Idaho Sage Grouse State Advisory Committee. The Idaho Mitigation Framework published as a discussion paper final draft in December of 2010 provides exceptional guidance and concepts for habitat and conservation efforts on private lands that may very well compliment practices and policies applied to federal lands. In order for any wholesale conservation effort to | pursue partnerships and will continue to communicate with other agencies and organizations, especially regarding conservation of sage-grouse. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | succeed, habitat and population management must extend across jurisdictional boundaries and include consideration of all stakeholders. | |
| DR-MTDK-SD-13-0015-24 | Public Lands Advocacy, Claire Moseley | Consumer Group | The NTT Report is not supported by the Western Association of Fish and Wildlife Agencies (WAFWA) as BLM's sole source of Sage-grouse management direction. In a letter sent to the Interior Secretary on May 16, 2013 WAFWA member states made it clear that they never endorsed the sole use of the NTT or any other scientific publication. Rather, they believe that a wide variety of peer-reviewed publications which collectively provide the best available science for sage grouse needs to be used by BLM as the basis for conserving the Sage-grouse, thereby avoiding a listing under the Endangered Species Act (ESA). They went on to recommend that management and regulatory mechanisms be based upon the best available science which would provide the best strategy for near- and long-term management of sage-grouse and provides the best opportunity for precluding the need to list the species under the ESA.<br><br>Additionally, the Northwest Mining Association (NWMA) recently published a report "BLM's NTT Report: Best Available Science or a Tool to Support a Pre-Determined Outcome?" • alleging that BLM failed to use best available science, ignored existing regulatory tools and adopted a pre-decisional Greater Sage-Grouse Conservation Policy. We share this view. The NWMA report questions the appropriateness of the NTT Report, because the USFWS' "warranted-but precluded" • determination was based upon the conservation measures already contained in BLM Manual 6840 - Special Status Species Management. Moreover, the USFWS concluded that BLM needed to properly and consistently implement Manual 6840 in its Resource Management Plans and | In addition to the studies and information from the NTT Report, the South Dakota Field Office has added several other sources of information, including data and results from local studies and expert opinion of local biologists. The data and studies used by the NTT are well-accepted by the broader scientific and conservation communities. It has been shown in multiple studies of sage-grouse and native ungulates that effects of oil and gas development extend far longer in time than the initial construction phase and over greater area than the physical footprint of the well pad. |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | provide sufficient monitoring data to demonstrate the effectiveness of the resulting conservation measures.<br><br>Another major fundamental concern is the inherent flaw in BLM's basic assumptions, due in part to the flawed recommendations contained in the NTT report, which fail to recognize that the level of disturbance associated with a well is not constant throughout its life. The highest level of surface disturbance associated with oil and gas development occurs during the construction, drilling and completion phases, which can last as little as a day or two up to a few months, depending upon the time it takes to complete the well. Once production ensues, these activities subside dramatically and only regular monitoring and maintenance of the well are required. Shortly after well completion, the operator normally begins interim reclamation to partially restore any impacted habitat. This partial reclamation will remain in effect until the well has been depleted. Upon conclusion of production activity, the operator will then move forward with plugging and abandonment procedures, which also includes final reclamation that will ultimately result in full restoration of the site and its return to productive habitat. | |
| DR-MTDK-SD-13-0027-7 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | According to BLM IM 2012-44, "The conservation measures developed by the NTT and contained in Attachment 1 must be considered and analyzed, as appropriate, through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-Grouse habitat." • This must be done fully in the South Dakota RMP EIS. IM 2012-44 does not provide an option not to analyze these measures in at least one alternative unless a clear finding is provided that the measure is not appropriate, and BLM has provided no such findings in the context of the SDRMP. | Conservation measures developed by the NTT were analyzed and incorporated into the preferred Alternative of the Draft RMP/EIS. PPAs in all Alternatives except current management (which did not have PPAs in the first place) are NSO for oil and gas operations. PPAs include most of the best sage-grouse habitat and leks in South Dakota. Leks in General Habitat also have protections in place, and sage-grouse winter habitat is NSO for oil and gas development. South Dakota has little sage-grouse habitat relative to most other states with sage-grouse habitat and relatively little BLM |

**Table W-12**
**Comments Related to National Sage-Grouse Strategy**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | For example, the NTT recommendations would apply a 4-mile buffer around leks with no surface disturbance allowed. For another example, the NTT Report calls for an unambiguous requirement that closed-loop drilling with no reserve pits be required within Core Areas, not incorporated into the Preferred Alternative. | surface ownership compared to states with both sage-grouse and BLM lands. A majority of the sage-grouse habitat that occurs on BLM land in South Dakota is protected to the extent practicable by stipulations and best management practices. |
| DR-MTDK-SD-13-0027-8 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | The NTT Report recommends withdrawal of Core Areas from mineral entry. This needs to be applied under the Final RMP, in the language proposed under Alternative C.<br><br>The NTT Report recommends that all electrical distribution lines be buried within Core Areas, period; BLM does not evaluate this in any alternative. Under Alternatives C and D, powerlines would be buried only within 2 miles of leks and only when it is safe to do so; otherwise they would be strung aboveground. According to BLM (2003: 2-8),<br><br>Power lines may also cause changes in lek dynamics, with lower growth rates observed on leks within 0.25 miles of new power lines in the Powder River Basin of Wyoming as compared with those further from the lines. This was attributed to increased raptor predation (Braun et al. 2002).<br><br>The National Technical Team fully considered the impacts of overhead powerlines, and also considered the impacts of noxious weeds, and both are discussed in detail in the NTT Report. After weighing carefully the relative harms from each threat, the NTT unambiguously recommended that electrical distribution lines be buried in all cases. No alternative in the SDRMP appears to implement this recommendation. | There is very good reason for not requiring all power lines be buried. Safety is one major concern, but another is habitat disturbance from burying the cables. The risks must be weighed in each circumstance before a decision is made and action taken. That is not to say that power lines would be allowed to be raised through the middle of a lek, just that when the risks to sage-grouse are low and risks to habitat quality and/or human safety are high, it becomes practical to have the power lines above ground. |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0011-1 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA asserts that 40 CFR 1502.16: Environmental Consequences section of NEPA has not been met throughout the DRMP/EIS. SD IWLA maintains that impacts to raptors, bats, sensitive species and other wildlife and their habitats due to energy development are inadequate and there were not compelling, scientifically supported mitigation options offered throughout any of the plan alternatives. | A reasonable range of alternatives was considered as shown in Table 2-2. In this table you will note that a range of alternatives were considered for all the species mentioned in the comments. The wildlife alternatives provide twenty different sets (rows) of alternatives with actions to conserve wildlife. The special status species section provides thirty seven sets of alternatives to conserve special status species.<br><br>Each set or row of alternatives provides three to four different actions that were considered. The Preferred RMP in the Final EIS provides major restrictions on nearly one half of the planning areas for the protection of special status species and wildlife. Meaningful mitigation measures are provided throughout the document. Refer to Appendix E for specific stipulations that were developed to address oil and gas impacts. Refer to Table 2-2 and Appendix B and V-1 for information on actions and practices to protect raptors, bats, sensitive species and other wildlife. The development of the Alternatives and the Mitigation measures were based on the most current science and proven management techniques. Mitigation is discussed in detail in Chapter 2 narrative section Table 2-2 and in Appendix B, C, and V-1. Table 2-1 provides a summary list of restrictions and stipulations that were developed to protect these species. |
| DR-MTDK-SD-13-0011-10 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA notes that, in contradiction to NEPA requirements, the plan and bibliography fail to apply, acknowledge or list all relevant science and research information that readily applies to resources affected in the plan. It would appear that the BLM did not consider the following relevant research conducted by South Dakota State University as it applies to wildlife, the | BLM used the best available information to address management of resources in the planning area. The sources referenced in various comments have been reviewed for relevancy and applied when applicable. In the case of sage-grouse, BLM needed to consider that sagebrush habitat is much different in Wyoming than in South Dakota. BLM recognized that other sage brush |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | greater sage grouse, sage steppe and grassland habitats in the planning area: It is critical to understand the similarities and differences between core areas of the sage grouse range in North America and those localities on the edge of the core that provide often overlooked and unique benefits to multi- species viability. Unmistakably, the fringes of the greater sage grouse range that are found in South Dakota are the first to be effected with declines in habitat suitability and population density. Recent research demonstrates that the edges of the species range can demonstrate higher productivity and contribution to regional population recovery than many areas within the core range.<br><br>*Refer to Table W-25 of this Appendix for a list of studies cited*.<br><br>The Lewis (2004) and Herman-Brunson (2007) publications are particularly applicable to the sage grouse/sage steppe management issue and strongly point out the values of diverse sage brush densities and associated plant diversity as it applies not only to sage grouse but also other sage brush obligate species. It should be noted that bird species richness was considerably better in South Dakota's sage steppe environment than was found in the Wyoming core. This fact alone strongly announces the need for thoughtful application of grazing management strategies to preserve and enhance vegetative height, densities and diversity. SD IWLA is curious as to why the BLM did not appear to consider these two viable research efforts in the planning process. | obligate species are a concern and in some instances addressed actions to include these obligate species. Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and South Dakota Game, Fish and Parks. The RMP provides a very conservative stocking level for livestock grazing under all of the Alternatives. Residual grass cover requirements are difficult to apply at a RMP level as different ecological site produce different amount of cover and many areas would not meet minimal cover requirements during drought periods even without grazing. Many of the site specific grazing management strategies including utilization limits are addressed at the project level. |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0011-3 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | SD IWLA is concerned that BLM has not discussed mitigation measures in sufficient detail to show that environmental impacts will be reduced to an insignificant level. We suggest here that simply identifying mitigation measures without analyzing the effectiveness of the measures does not, in our estimation, fulfill the intent of NEPA. The SD IWLA believes that mitigation should be as much about avoidance or minimization of impacts as it is compensatory actions after the damage is done. Similarly, we remain concerned that statements about monitoring do not go far enough to fulfill mitigation requirements. If BLM expects environmental damage, monitoring in succession in order to finally detect the damage expected seems unlikely to reduce or actually alleviate environmental impacts. | Avoidance is described and discussed as a form of mitigation in chapter 2 of the Final RMP/EIS. Many detailed mitigation measures are discussed in the Final RMP/EIS in Appendix B (Best Management Practices and Standard Operating Procedures, C (SD Mitigation Practices) V (Mitigations Measures and Conservation Actions for Sage Grouse Habitat) and in the Management Common to All Alternatives for various resources. Monitoring would be completed as discussed in the Alternatives section of Chapter 2 for each resource or resource use and as described in Appendix N. |
| DR-MTDK-SD-13-0015-18 | Public Lands Advocacy, Claire Moseley | Consumer Group | While the DEIS does not specify parameters for avoiding noise disturbance to grouse, we have seen in other Draft RMPs where BLM is planning to rely upon "emerging research" • relative to the impact of noise on wildlife, specifically greater sage-grouse and mountain plover which indicates the level of noise or the 49-dBA level (10 dBA over background) commonly found in BLM documents may not be sufficiently protective (Blickley and Patricelli undated, Blickley and Patricelli 2010)." | BLM is considering all new research in terms of noise impacts to wildlife and special status species. |
| DR-MTDK-SD-13-0015-7 | Public Lands Advocacy, Claire Moseley | Consumer Group | Alternative D contains countless new and restrictive stipulations which address sensitive soils, water, wildlife, air quality, etc., but the DEIS fails to provide any scientific justification for this significant increase in restrictions. The statement on page 467 that many decisions were made in the absence of quantitative data by relying upon the "best professional judgment" • is inadequate. We recognize that in some cases such judgment is necessary, but no rationale was provided beyond the absence of quantitative data. | A careful review of research and management practices was conducted when restrictions were developed. The Draft RMP/EIS does not make decisions; it lays out a range of alternatives for the decision maker so they can make an informed decision and provides a disclosure of impacts to the public. Restrictions were developed to provide adequate protection for the resource or to limit conflicts between resources uses. In some cases studies with qualitative data were lacking. As discussed in chapter 4, BLM used professional judgment in some |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | cases when information was limited to develop a range of alternatives with various degrees of restrictions. |
| DR-MTDK-SD-13-0027-10 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Importantly, the BLM appears to rely heavily on discretionary measures such as "avoidance" • rather than "exclusion" • of activities known to be detrimental to sage grouse inside Priority Habitat areas. And even more importantly, BLM in many cases adopts measures that provide inadequate protections based on the available science, which outlines thresholds at which significant impacts can be expected. The Preferred Alternative will need to be strengthened to meet the level of protection recommended in the National Technical Team Report at minimum in order to represent effective conservation measures that have some chance of obviating the need to list the greater sage grouse in general, and this population in particular, as Threatened or Endangered.<br><br>We strongly agree with the following goal that is listed by BLM for the RMP revision, "Maintain and/or increase sage-grouse abundance and distribution by conserving, enhancing or restoring the sagebrush ecosystem upon which populations depend in cooperation with other conservation partners." • DEIS at 20. This goal should become a guiding principle for the new RMP, and should inform all land allocations and management procedures. Sage grouse conservation measures both within Priority and General Habitats, should be sufficient to achieve this goal. The present Preferred Alternative is not sufficient at this point in this regard, and needs strengthening as follows.<br><br>The EIS states, "Offsite mitigation is generally appropriate when the authorized officer determines that impacts cannot be mitigated to an acceptable level onsite and it is expected that the land use authorization as | The PPAs identified in the Draft RMP/EIS contain a highly intermingled mixture of various land ownership types and avoidance areas for general ROWs was determined to be the most effective practical solution. Sage-grouse PPAs are exclusion areas for renewable energy ROWs and avoidance for other types of ROWs. The language about mitigation does not mean that a decision has been made to approve the project; it states the type of mitigation that may be required. |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | submitted would not be consistent with the BLM's resource objectives." • DEIS at 26. We are concerned that this implied that BLM intends to move forward with approval of projects whose impacts will not be ameliorated through avoidance and minimization strategies.<br><br>We are concerned that BLM may not fully apply mitigation measures identified in the RMP revision, using agency discretion to create loopholes in cases where project proponents find mitigation measures to be onerous. Under the RMP, "Because of site-specific circumstances, some mitigation measures and conservation actions may not apply to some activities (e.g., a resource or conflict is not present on a given site) and/or may require slight variations from what is described in Appendix V (now Appendix V-1)"....It is anticipated that variations in the mitigation measures and conservation actions will be approved in very limited circumstances and only in coordination with state wildlife management agencies." • DEIS at 26. Furthermore, "The determination of adequate application of the mitigation measures and conservation actions for specific projects will remain with the BLM's Authorized Officer." • Id. Meanwhile, the Guidelines and Best Management Practices in Appendix B will be wholly discretionary because "Guidelines and BMPs (Appendix B) will be used to guide management practices based on site-specific evaluations." • DEIS at 32.<br><br>The greater sage-grouse was listed as a species of greatest conservation need in South Dakota's Wildlife Action Plan (SDGFP 2006). | |
| DR-MTDK- | WildEarth Guardians, Erik | Environmental Protection | Alternative D would treat these same lands as avoidance areas only (DEIS at 45); this discretionary and squishy | BLM uses avoidance areas to restrict ROWs in areas with high value or sensitive resources. This leaves BLM |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| SD-13-0027-11 | Molvar | Association | language undermines the ability of any agency to rely on this measure as an adequate and effective conservation measure. Precluding these rights-of-way within 3 miles of sharp-tailed grouse and greater prairie chicken active leks (id.) also seems prudent. | the option to not allow the ROW if project level environmental review determines adverse impacts are likely. |
| DR-MTDK-SD-13-0027-15 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Numerous Literature sources cited for consideration.<br><br>*Refer to Table W-25 of this Appendix for a list of references that were provided.* | BLM considered a number of publications and research but cannot reference literature source that is available. Various studies have strengths and weakness and BLM used the best available information to address management of resources in the planning area. The sources referenced in various comments have been reviewed for relevancy and applied when applicable. |
| DR-MTDK-SD-13-0027-2 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | The failure to look at the full range of reasonable alternatives is related to BLM's duty in any environmental analysis to develop, study, analyze and adopt mitigation measures to protect other resources. The ability to adopt post-leasing mitigation measures - see 43 C.F.R. § 3101.1-2 - is quite broad, as all reasonable measures not inconsistent with a given lease may be imposed by BLM. This is particularly true given that BLM, pursuant to FLPMA, must manage public lands in a manner that does not cause either "undue" • or "unnecessary" • degradation. 43 U.S.C. § 1732(b). Put simply, the failure of BLM to study and adopt these types of mitigation measures "“ especially when feasible and economic "“ means that the agency is proposing to allow this project to go forward with unnecessary impacts to public lands, in violation of FLPMA.<br><br>The Tenth Circuit examined NEPA's alternatives requirement and agreed with other courts that "have interpreted NEPA to preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one | BLM has evaluated a reasonable range of Alternatives in the Proposed SD RMP and Final EIS while still providing multiple-use benefits. The objectives in the Proposed SD RMP have been kept broad as required by NEPA. Mitigation measures are provided in Table 2-2 and discussed throughout Chapter 4. |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1165 (10th Cir. 1999), at 1174 (citing Simmons v. United States Corps of Eng'rs, 120 F.3d 664, 669 (7th Cir. 1997)). At the same time, an agency may not completely ignore an applicant's objectives. See id. at 1174-75. Taken together, these directives "instruct agencies to take responsibility for defining the objectives of an action and then provide legitimate consideration to alternatives that fall between the obvious extremes." • Id. at 1175. See All Indian Pueblo Council v. United States, 975 F.2d 1437, 1444 (10th Cir. 1992) (a thorough discussion of alternatives is "imperative" • ). | |
| DR-MTDK-SD-13-0027-4 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | In the South Dakota RMP DEIS, BLM must take the legally required "˜hard look' at the efficacy of sage grouse conservation measures, particularly those applied within Core Areas. BLM also must take the legally required "˜hard look' at direct or cumulative impacts to sage grouse wintering habitat under the various alternatives; since the impact of development approved under the RMP on breeding and nesting sage grouse matters little if sage grouse populations do not survive the winter. In order to achieve this, wintering habitats must be identified as part of the NEPA process. | Wintering habitat are identified and protected through restrictions ranging from CSU to NSO stipulations depending on the Alternative. Refer to table 2-2 Special Status Species section. |
| DR-MTDK-SD-13-0028-2 | The Wildlife Society, Silka Kempema | Wildlife Association | We point out the most egregiously missing NEPA requirements. In the interest of brevity, we provide only one example as a demonstration of our concerns but that is not to imply it is our only environmental concern (see attached comments). Most NEPA regulations were found at: http://www.blm.gov/wo/st/en/prog/planning/nepa/webguide/cfr/40_cfr_1502.html<br><br>40 CFR 1502.14: Alternatives Including the Proposed | A reasonable range of alternatives was considered as shown in Table 2-2. In this table you will note that a range of alternatives were considered for all the species mentioned in the comments. The wildlife alternatives provide twenty different sets (rows) of alternatives with actions to conserve wildlife. The special status species section provides thirty-seven sets of Alternatives to conserve special status species. Each set or row of Alternatives provides three to four different actions that were considered. The Proposed RMP in the Final EIS |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | Action<br><br>Reasonable and accurate range of alternatives was missing. We cannot compare alternatives among each other, or to the no-action alternative, when data is inconsistent between alternatives, missing or inaccurate. Appropriate and scientifically-based mitigation measures were lacking.<br><br>40 CFR 1502.16: Environmental Consequences<br><br>This entire section of NEPA was not met throughout the DRMP/EIS. For example, see our comments regarding impacts to raptors, bats, sensitive species and other wildlife and their habitats due to energy development was inadequate and there were not compelling, scientifically supported mitigation options offered throughout the alternatives.<br><br>40 CFR 1502.22: Incomplete or Unavailable Information<br><br>Surveys and inventories of wildlife and habitats are required before a plan revision can propose directives that will be in force for the next 20+ years (lifespan of a RMP). For example, energy development and livestock grazing are two current and likely future actions. If data on impacts (direct, indirect, and reasonably foreseeable future) to natural resources are available, they need to be fully incorporated. If data is not available at the time of plan revision, BLM needs to be transparent and simply state as much. For example, see our comments on Greater Sage Grouse Habitats and controlled surface use. BLM is required to include "a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse | provides major restrictions on nearly one half of the planning areas for the protection of special status species and wildlife. Meaningful mitigation measures are provided throughout the document. Refer to Appendix E for specific stipulations that were developed to address oil and gas impacts. Refer to Table 2-2 and Appendix B and V-1 for information on actions and practices to protect raptors, bats, sensitive species and other wildlife. The development of the Alternatives and the Mitigation measures were based on the most current science and proven management techniques. Mitigation is discussed in detail in Chapter 2 narrative section Table 2-2 and in Appendix B, C, and V-1. Table 2-1 provides a summary list of restrictions and stipulations that were developed to protect these species. Within the limits of its funds and staff, BLM completed inventories, surveys and co-funded sage-grouse studies with the SD GFP prior to completion of the proposed RMP and EIS. BLM has reached out to other agencies, organizations and stakeholders to obtain additional information.<br><br>In response to the greater sage-grouse management objectives described in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy, many reports have been prepared for the development of management recommendations, strategies, and regulatory guidelines. The National Technical Team report (NTT 2011), Conservations Objectives Team (COT; FWS 2013), and the Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) are the most widely used reports that have been incorporated in BLM and Forest |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | impacts." • For example, see our comments for Greater Sage-Grouse PPAs in MA #20 Alt B and Preferred Alt.<br><br>40 CFR 1502.24: Methodology and Scientific Accuracy<br><br>For example, the DRMP/EIS did not incorporate critical science-based information from WAFWA (Western Association of Fish and Wildlife Agencies) for Greater-Sage Grouse (see our comments MA #20 Alt B and Preferred) or some of the more recent research from SD and North Dakota on sagebrush steppe and grouse. | Service EISs that address the effects of implementing greater sage-grouse conservation measures on lands they manage. |
| DR-MTDK-SD-13-0028-4 | The Wildlife Society, Silka Kempema | Wildlife Association | As currently written, we assert that any chosen alternative will not lead to a fully informed decision and therefore, violate the NEPA directives we point out, as well as 40 CFR 1505.1: Agency Decision-making Procedures. Therefore, we strongly assert that it is premature to base a Decision on the current draft even with public input because we could not adequately evaluate and compare alternatives. Too much information is missing and must be supplemented. | The draft has been modified based on public input received during the public comment period. The final decision will be based on the final RMP/EIS not the draft. Comments that specifically identified missing or incomplete information were addressed in the final RMP/EIS. |
| DR-MTDK-SD-13-0030-11 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The NEPA requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. §4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the South Dakota DRMP. | BLM has determined that 98% of public land rangelands in the planning area are not adversely impacted by livestock grazing practices and standards for rangeland health are being met on over 90% of the Allotments. In cases where livestock were determined to be a significant factor in not meeting standards, actions have already been taken at the project level to change management and improve conditions. In addition, BLM received no specific information about specific instances or areas that were adversely impacted by livestock grazing during the RMP planning process. A decision to decrease livestock grazing by 50% would be difficult to apply when on-the-ground conditions do not warrant such a change. BLM has no long term |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | studies that conclusively demonstrate that current levels of grazing are causing significant adverse impacts to endangered, special status or sensitive species on BLM lands in the planning area. The discussion in Chapter 2 with the section heading "Alternatives Considered but Eliminated from Detailed Analysis" describes the rationale for not considering a no grazing or a reduced grazing alternative. BLM still maintains the ability to reduce grazing levels at the allotment level scale through project level (implementation) planning if adverse impacts to other resources are occurring. |
| DR-MTDK-SD-13-0030-12 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The DEIS fails to considers a reasonable range of alternatives. The alternatives considered propose no meaningful changes to livestock grazing practices in the planning area, despite the numerous and severe impacts of livestock grazing on sage-grouse habitat and other values.<br><br>The DRMP does not analyze the no grazing alternative, and attempts to justify this lack of analysis by claiming that a no grazing alternative would be inconsistent with the purpose and need of the DRMP. The DRMP argues that because the BLM has "considerable discretion" • to adjust grazing levels, the agency need not analyze the no grazing alternative. The DRMP states that "[b]cause the BLM has considerable discretion through its grazing regulations to determine and adjust stocking levels, seasons-of-use, and grazing management activities, and to allocate forage to uses of the public lands in an RMP, the analysis of an alternative to entirely eliminate grazing is not needed." • | BLM has determined that 98% of public land rangelands in the planning area are not adversely impacted by livestock grazing practices and standards for rangeland health are being met on over 90% of the Allotments. In cases where livestock were determined to be a significant factor in not meeting standards, actions have already been taken at the project level to change management and improve conditions. In addition, BLM received no specific information about specific instances or areas that were adversely impacted by livestock grazing during the RMP planning process. A decision to eliminate or substantially decrease livestock grazing would be difficult to apply when on-the-ground conditions do not warrant such a change. BLM has no long term studies that conclusively demonstrate that current levels of grazing are causing significant adverse impacts to endangered, special status or sensitive species on BLM lands in the planning area. The discussion in Chapter 2 with the section heading "Alternatives Considered but Eliminated from Detailed Analysis" describes the rationale for not considering a no grazing or a reduced grazing alternative. BLM still maintains the ability to reduce grazing levels at the allotment level scale through project level |

**Table W-13**
**Comments Related to NEPA**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | | (implementation) planning if adverse impacts to other resources are occurring. |
| DR-MTDK-SD-13-0030-3 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The DRMP fails to provide in-depth analysis of various alternatives, including a no grazing alternative, and two or more significantly reduced livestock use alternatives. In contrast, oil and gas development impacts to sensitive species are analyzed in more detail, but livestock grazing impacts are not sufficiently analyzed. | BLM has considered a reasonable range of alternatives in the Final EIS. Twenty seven management actions are included in the livestock grazing section as noted in the management actions common to all Alternatives and management actions for individual Alternatives in the Livestock Grazing Section of Table 2-2. |
| DR-MTDK-SD-13-0030-6 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | We have referenced a number of scientific studies, compiled in the Literature Cited section of these comments, which BLM must read and consider in order to meet its obligation to "use the best available science" • including publications specifically mandated under the Strategy. | These studies have been reviewed and considered in the Final EIS. |
| DR-MTDK-SD-13-0048-1 | Butte County Commissioners, Kim W Kling | Local Government | Please add to the RMP the justification for the size and scope of this draft. | The Final EIS addresses the size and scope of the RMP/EIS in Chapter 1. The RMP/EIS is a large document because it addresses many different programs and uses and evaluates a range of alternatives to address management of these programs and uses. |

**Table W-14**
**Comments Related to Noxious Weeds**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0030-19 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | Grazing across many states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage-grouse rely for food and cover. Approximately 36 percent of the Greater sage-grouse range is invaded by cheatgrass. 5 Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invaded areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.<br><br>Biological invasions, especially invasion by exotic annual grasses such as cheatgrass, are consistently cited as among the most important challenges to maintenance of healthy sagebrush communities. 6 Estimates of the rapid spread of weeds in the West include 2,300 acres per day on BLM lands and 4,600 acres per day on all western public lands. 7 Clearly, the BLM needs to consider the cause of these infestations and the contribution of domestic livestock grazing to them.<br><br>A recent study published in the Journal of Applied Ecology concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. 8 To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features that are quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.<br><br>5 Lebbin, Daniel J.; Parr, Michael J.; and Fenwick, | The conservative stocking rates and other grazing practices described in the RMP would not lead to an increase in cheatgrass. While cheatgrass is present in SD, infestations are limited and do not typically cause the stand replacement of other grasses that sometimes occurs in the Great Basin. Fire control and cheatgrass was not listed as a major threat to Mgmt. Zone 1 (which includes SD) by the Sage-Grouse National Technical Team. |

**Table W-14**
**Comments Related to Noxious Weeds**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | George H., The American Bird Conservancy Guide to Bird Conservation. The University of Chicago Press, 2010.<br><br>6 Miller, R. F., S. T. Knick, D. A. Pyke, C. W. Meinke, S. E. Hanser, M. J. Wisdom, A. L. Hild. 2011. Characteristics of sagebrush habitats and limitations to long-term conservation. Pages 145-184 in S. T. Knick and J. W. Connelly (eds). Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and its Habitants. Studies in Avian Biol. Series, vol. 38. Cooper Ornithological Society. Univ. Calif. Press. Berkeley, CA.; Wisdom, M. J., M. M. Rowland, R. J. Tausch. 2005c. Effective management strategies for sagegrouse and sagebrush: a question of triage? Trans. N. Wildl. Nat. Res. Conf. 70: 206-227.<br><br>7 See 65 Fed. Reg. 54544.<br><br>8 Reisner, Michael D.; Grace, James B.; Pyke, David A.; Doescher, Paul S. 2013. Conditions favouring Bromus tectorum dominance of endangered sagebrush steppe ecosystems. Journal of Applied Ecology.<br><br>Anderson and Inouye found that viable remnant populations of native grasses and forbs are able to take advantage of improved growing conditions when livestock are removed. They found further that despite depauperate and homogenous conditions of permanent plots in 1950, after 45 years vegetation had been anything but static, clearly refuting claims of long-term stability under shrub dominance. Mean richness per plot of ALL growth forms increased steadily in the absence of domestic livestock grazing. Grasses and forbs increased significantly. This information should | |

**Table W-14**
**Comments Related to Noxious Weeds**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | be integrated into the "No Grazing" or "Reduced Grazing" alternatives and, given these findings, the BLM should analyze the impacts of long-term authorized grazing and its impacts on sagebrush communities and obligates compared to the impacts of removing livestock and allowing these communities to recover naturally. | |
| DR-MTDK-SD-13-0047-24 | State of South Dakota | State Government | On page 341, we suggest that Table 3-12 should be updated with the current state and local noxious weed lists found at http://sdda.sd.gov/farming-ranching-agribusiness/weed-pest-control/ | This table has been updated. |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0011-21 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Public lands within ¼ mile of sharp-tailed grouse and greater prairie-chicken leks would be an exclusion area for commercial renewable energy development and an avoidance area for other ROWs.<br><br>Prairie grouse, much like sage grouse, seem to be highly sensitive to anthropogenic disturbances and developments, USF&WS recommends that placement of wind towers, transmission lines, oil and gas developments and energy corridors such as pipelines, be located not closer than 8 kilometers from known leks. | The final RMP contains a 2 mi avoidance area for sharp-tailed grouse and prairie chicken leks that will allow strategic siting of development so as to minimize impacts to prairie grouse species. |
| DR-MTDK-SD-13-0011-22 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Surface disturbing and disruptive activities would be avoided within ½ mile of known bald eagle nest sites which have been active within the preceding 5 breeding seasons. Other surface occupancy and permitted uses could be limited at the project level.<br><br>SD IWLA disagrees with this statement. Both Bald and Golden Eagles are covered under the Eagle Protection Act and should be regarded in the same context with the same protections. Open landscapes of Western South Dakota dictate that more space is needed for protection of nest sites and hunting perches because eagles are very sensitive to visual line of sight impacts. The FWS, recommends 0.5 miles for both Bald and Golden eagles in spatially generous ecotones and further recommends that project related disturbance and habitat alterations be strictly avoided within a minimum of .5 miles between the periods of January 15 through July 31. | BLM provides NSO and timing limits buffer up to 1/2 mile for golden eagles. |
| DR-MTDK-SD-13-0011-23 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Public lands within ¼ mile of sensitive raptor nests would be an exclusion area for commercial renewable energy development and an avoidance area for other ROWs. At the present time raptors that would be addressed by management action 7 include ferruginous | Since different studies provide information on the impacts of various activities on various raptors, the protections were split out to the extent needed to provide adequate protection for each species. As pointed out in another section of the letter provided by |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | hawk, northern goshawk, Swainson's hawk, golden eagle, and burrowing owls (peregrine falcons and bald eagles nests addressed in management actions 2 and 5).<br><br>SD IWLA recommends that provisions for specific raptor protections be moved under the umbrella of the eagle protections. Protection of raptor species and their life requirements needs to species specific and not grouped together for managements convenience. | the same commenter "Protection of raptor species...needs to [sic] species specific and not grouped together for managements [sic] convenience." |
| DR-MTDK-SD-13-0015-10 | Public Lands Advocacy, Claire Moseley | Consumer Group | COMMENT: This buffer significantly exceed the U.S. Fish and Wildlife Service's (FWS) recommended restrictions for oil and gas activities around raptor nests, which call for 200 meter (660 feet) buffers. Accordingly, the ¼ mile buffer is unreasonable and has not been specifically justified in the RMP/DEIS. FWS' NSO restrictions for special status eagles and raptors are scientifically based and completely adequate. Accordingly, we strongly recommend that the buffers in the final RMP be modified to comport with the FWS' recommendation.<br><br>COMMENT: What is the scientific justification for a nest considered to be "active" • if it has been used in the past seven years? Without a clear explanation for the six season "active" • definition, this restriction is unreasonable and arbitrary. For example, if a nest was used in the past six years prior to a proposed surface disturbance and has not been used since, it is reasonable to assume that the nest either has been abandoned or no longer contains the resource values to attract raptors. Yet it will still be considered "active" • by BLM and would trigger the stipulations and restrictions identified in Chapter 2, even though the nest may never be "active" • again.<br>In addition, BLM has not identified which nests within | FWS recommends certain buffers while encouraging more conservative measures. This is especially true for eagle nests, where FWS strongly recommends taking landscape into consideration when applying distance buffers. FWS recommends greater buffer distances in more open landscapes like those found in many parts of South Dakota. FWS also recommends the active/inactive definition used by BLM in the RMP. It would be impractical to identify and map all active and inactive raptor nests in the RMP because the life of the plan spans a period during which nests may become inactive while new ones are established. Not providing a map also further protects raptors from other potential disturbances. In cases that are questionable, BLM would make a call on whether to protect the nest or not based on the best available information. If a project proponent does not agree with BLM they have the option of collecting their own data provided they use qualified personnel and follow proper procedures. |

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**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | the planning area have been active within the past seven years and it is unclear whether the burden to demonstrate that a nest has or has not been active falls on an operator or the BLM. In order to demonstrate that habitat can be maintained so that raptors are not precluded from using nest sites, operators must have a well-defined understanding of the location of active nests and adequate justification that they have been in fact active sometime in the recent past. In addition, BLM has failed to map active or inactive nests for raptor in the map section in the DEIS.<br><br>BLM must clearly explain and justify the methodology used to define a nest as "active" • in order to use the proposed timeline in surface use restrictions for future oil and gas leases. If BLM ultimately decides that the standard by which a nest will be considered "active" • is use within the last seven years or some other period of time, the agency must explicitly state that nest sites that have been inactive within the past seven years or some other period of time will not be subject to the surface disturbing and disruptive activities and lease stipulations identified in Chapter 2. BLM must also clearly identify and map active and inactive raptor nests in the final EIS. | |
| DR-MTDK-SD-13-0015-11 | Public Lands Advocacy, Claire Moseley | Consumer Group | Page 2-92: "Surface disturbing and disruptive activities would be avoided within ½ mile of known bald eagle nest sites which have been active within the preceding 5 breeding seasons." • (Special Status Species, Management Action 1)<br><br>COMMENT: This buffer significantly exceeds the U.S. Fish and Wildlife Service's (FWS) recommended restrictions for oil and gas activities around raptor nests, which call for 200 meter (660 feet) buffers. Accordingly, the ½ mile buffer is unreasonable and has not been | An important part of making a Resource Management Plan an effective management tool is aligning management actions with surrounding RMPs to the extent practicable so that management actions are consistent across a larger area. Although the US Fish and Wildlife Service recommends only 200 m as a buffer, maintaining consistency with the IDT Team's neighboring field offices and the recommendations of the Montana/Dakotas State Office requires that the IDT Team include a 1/2 mile buffer around bald eagle nests. Second, Eagles are known to have multiple nests that |

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| | | | justified in the RMPA/DEIS. FWS' NSO restrictions for special status eagles and raptors are scientifically based and ought to be relied upon by BLM for raptors. Accordingly, we recommend that the buffers in the final RMP comport with the FWS' recommendation.<br><br>COMMENT: The DEIS fails to provide any scientific justification for a nest considered to be "active" • if it has been used in the past five breeding seasons. Without a clear explanation for the five season "active" • definition, this restriction is unreasonable and arbitrary. For example, if a nest was used in the past four breeding seasons prior to a proposed surface disturbance and has not been used since, it is reasonable to assume that the nest either has been abandoned or no longer contains the resource values to attract bald eagles. Yet it will still be considered "active" • by BLM and would trigger the stipulations and restrictions identified in Chapter 2, even though the nest may never be "active" • again.<br><br>Moreover, BLM has not identified which nests within the planning area have been active within the past five breeding seasons and it is unclear whether the burden to demonstrate that a nest has or has not been active falls on an operator or the BLM. In order to demonstrate that habitat can be maintained so that raptors are not precluded from using nest sites, operators must have a welldefined understanding of the location of active nests and adequate justification that they have in fact been active sometime in the recent past. In addition, BLM has failed to map active or inactive nests for bald eagles in the map section in the DEIS.<br><br>BLM must clearly explain and justify the methodology used to define a nest as "active" • in order to use the | they move between each year. That a pair of eagles uses a nest for 4 years but doesn't the 5th might only mean that it has "rotated" nests that year and may be back in another year or several. The 5 year rule is once again consistent with the Montana/Dakotas State Office and neighboring offices, as well as having been selected for bald eagles based on USFWS National Bald Eagle Management Guidelines (2007) recommendations. Furthermore, the IDT Team initially proposed NSO until there has 7 years of inactivity, based on scientific research on fluctuation of preferred prey species (C. White BYU 1998 pers. comm. in Romin and Muck 2002), but went with the 5 year guidance instead.<br><br>Regarding the lack of location data for raptor nests, this is indeed a concern. This field office has locations of some nests but does not have a comprehensive and up-to-date set of locations. This is something that may be resolved in future projects and by partnering with the Forest Service and SD Game, Fish & Parks and other organizations. If a project propend disagrees with State or BLM data on nest activity, they have the option of hiring a contractor to document nest use. It is important that we have protections in place for the nests we do know exist and for the protection of nests found in the future. Identification of current active nests by providing maps in the RMP has limited value as this information is in a constant state of flux. |

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**Comments Related to Other Special Status Species**

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| | | | proposed timeline in surface use restrictions for future oil and gas leases. If BLM ultimately decides that the standard by which a nest will be considered "active" • is use within the last five breeding seasons or some other period of time, the agency must explicitly identify nest sites that have been inactive within the past five years or some other period of time which will not be subject to the surface disturbing and disruptive activities and lease stipulations identified in Chapter 2. BLM must also clearly identify and map active and inactive bald eagles nests in the final EIS. | |
| DR-MTDK-SD-13-0015-15 | Public Lands Advocacy, Claire Moseley | Consumer Group | We are puzzled as to why BLM has opted to designate all bighorn sheep range as NSO in the preferred alternative, rather than applying seasonal timing limitations in certain areas within the occupied range, including lambing and wintering areas. BLM has provided no evidence that a year-round NSO stipulation for the entire range is necessary, nor has it indicated that every acre of habitat requires further protection than the seasonal prohibition of use. | Game, Fish and Parks is concerned about bighorn sheep numbers in the Black Hills. Relatively speaking, there are not a lot of acres of bighorn sheep range in South Dakota, and fewer still on BLM land in South Dakota. Bighorn sheep numbers are low presently due to recent disease outbreaks and poor lamb survival. Game, Fish & Parks may translocate bighorn sheep into the Black Hills within the next year or two, and there is no way of knowing what will be important lambing and wintering areas in the future. |
| DR-MTDK-SD-13-0015-9 | Public Lands Advocacy, Claire Moseley | Consumer Group | We question the need to include a stipulation for species not known to exist within the planning area. BLM has the authority to conduct maintenance actions if and when either of these species turns up in the planning area. | All species addressed in the stipulations are present in the planning area (South Dakota); however they may not be present in the decision space for this RMP/EIS which includes only BLM administered surface and mineral estate (BLM administered lands). The reason for addressing species that are not present on BLM administered lands is because information about habitat, habitat use, and the movement of animals is not always well documented and the range of some species changes over time. In some cases, species near BLM administered lands may expand their range to include BLM administered lands or they may already use these lands but information about this use is lacking. |

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| | | | | In many cases, a simple plan maintenance action cannot be used to include a new stipulation because of the impacts of the new stipulation. In these cases, an RMP plan amendment is needed. A plan amendment is time consuming, costly and may result in delays in terms of actual protection. |
| DR-MTDK-SD-13-0018-1 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | I attach the May, 2013 petition to list the Oregon-Cascades/California and Black Hills (South Dakota, and a portion of Wyoming) populations of the Black-backed Woodpecker (Picoides arcticus) as a threatened or endangered species and to designate critical habitat to ensure its survival and recovery.<br><br>I attach Chris Rota's 2013 thesis on Black-backed Woodpecker research in the Black Hills.<br><br>I attach the 2013 draft Revision of the Black-footed Ferret Recovery Plan by the USFWS [Note: not included in emailed attachments]<br><br>I attach September 2003 petition for a rule to list the Black Hills mountain snail (Oreohelix cooperi) as threatened or endangered under the ESA and petitioners further requested that Critical Habitat be designated for the species concurrent with the listing.<br><br>I attach the 2008 petition for a rule to list the Black Hills population of American dipper (Cinclus mexicanus unicolor) as a threatened or endangered distinct vertebrate population segment ("DPS" • ) under the ESA.<br><br>The petitions to list the snail and the dipper failed, the petition on the Black-backed woodpecker is still being considered. | The references will be revised to reflect the documents used in the final RMP and reviewed when a biological assessment for the RMP/EIS is completed. |

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| | | | We request that you add these documents to your references and use the data within as needed as you consider your RMP Revision | |
| DR-MTDK-SD-13-0018-2 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | We request that BLM consider the Black Hills population of the American Dipper and the Black Hills mountain snail as a sensitive species. These are local population to the Black Hills and thus the National BLM may have not considered them for their sensitive species list.<br><br>We request that the BLM RMP fully review these species habitat and populations that exist on or near their lands and discuss impacts to the habitat and species from your actions. For example dippers are sensitive to water quality issues and the BLM owns lands that could be developed or roaded in the Deadwood/Lead area may drain to waters with dippers (mostly Whitewood, but a small area to Spearfish Creek). Black-backed woodpeckers need wildfire and you have wooded lands in the Deadwood/Lead area and the Fort Meade. Please discuss the effect of your fire management plans on the woodpecker. We request that an alternative be protective of these at risk species and you consider the issues associated with them, when developing a preferred alternative. | The RMP addresses these species. Many of these species and habitat factors are also considered at a project level and on a case-by-case basis as part of RMP implementation. Of special concern is fire in the Black Hills as it relates not only to wildlife but also to humans. Most of the land managed by BLM in the Black Hills is in close proximity to Lead, Deadwood, and Sturgis. While it would be ideal from a black-backed woodpecker standpoint to allow fire as a natural and/or regular management action to occur, the risk to human life, safety, and infrastructure makes this a delicate, if not impossible, task. As it is, the staff of the BLM work as an interdisciplinary team to develop management actions that consider all pertinent resources when developing a project. |
| DR-MTDK-SD-13-0018-3 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please discuss fully the extent of documented range of plague in areas having prairie dogs in SD. We want you to review not just the plague at Conata Basin, but plague at or near other ferret release sites such as Cheyenne River Sioux Tribe's area. Please discuss the nearest plague events to your lands. Are your lands more isolated from known plague than other ferret reintroduction sites? | The SD Game, Fish & Parks has a black-tailed praire dog management plan that discusses objectives for monitoring occurrence of plague outbreaks. As far as the respondent can tell, there have been no documented outbreaks in western SD within the past decade. The spread of plague depends on several factors, including isolation of host populations (prairie dogs) and the transfer of infected fleas via predators between prairie |

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| | | | | dog towns. According to GFP's management plan, plague has not been detected at the Cheynne River Sioux Tribe release site, nor at Rosebud Sioux Tribe Reservation. The prairie dog towns that occur on BLM lands in South Dakota are too small and not in large enough complexes to support black-footed ferrets. There have been no documented cases of plague on or near BLM administered lands in SD. |
| DR-MTDK-SD-13-0018-4 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please include a map all prairie dog lands and the prairie dogs on adjacent lands in your area. The GFP is doing their 4 year inventory of prairie dogs and should have that done by the end of the year 2013 and they are a cooperating agency. | Game, Fish & Parks personnel responded that the 2013 survey data and final report are not yet available. When GFP have completed their project the maps and information will be available to the public. The most current data on prairie dogs is available to the public via GFP's website in the prairie dog plan. |
| DR-MTDK-SD-13-0018-5 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please discuss if your prairie dog acreage, which is almost 2,000 acres, could support Blackfooted ferret reintroduction and 30-50 individuals. If it can't, how much does it have to grow to do so? Please provide an alternative, where prairie dogs are encouraged to grow and meet levels to sustain small populations of ferrets. | While BLM has nearly 2,000 acres of prairie dogs colonies, these colonies are too small, too far dispersed and isolated to support a black-footed ferret reintroduction, and BLM lands are too small and scattered to support prairie dog reintroduction/supplementation. In most cases. Individual prairie dog colonies on BLM administered lands are less than 100 acres in size with many colonies ranging from three to 50 acres. |
| DR-MTDK-SD-13-0018-6 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please provide maps of your prairie dog acreages in the FEIS and discuss effects of utility lines, oil and gas development, and locatable and leasable mineral exploitation, wind energy development , road building and recreation on potential of prairie dog colonies to support both prairie dogs and ferret reintroduction. Please discuss impacts to burrowing owls of such development. Please discuss relationship of known locations of ferruginous hawks and swift fox to your praxirie dog habitat. | The prairie dog towns that exist on BLM lands in South Dakota are not large or extensive enough to support a black-footed ferret population. Burrowing owls are affected by development in a similar manner to other raptors and can succumb to strikes with wind turbine blades and other man-made structures. A decline in prairie dogs would also reduce the availability of burrows for burrowing owls, although burrowing owls can and will use burrows made by other animals as well as artificial burrows made by humans. The BLM does not have current records of swift fox populations in the |

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| | | | | analysis area. Ferruginous hawks can be found in prairie habitat and may prey on prairie dogs. BLM does not have extensive data on locations of ferruginous hawks, and certainly not enough to draw conclusions from their locations relative to prairie dog colonies. The amount of surface disturbance created by road building, power lines and mineral developed is discussed at the beginning of Chapter 4. Such type of development is unlikely to have a major impact on prairie dogs or black-footed ferrets as the proposed actions implement a CSU stipulation for oil and gas development on prairie dog towns, and a NSO for oil and gas development on black-footed ferret habitat (should ferrets occur on BLM lands). |
| DR-MTDK-SD-13-0018-7 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | GOSHAWK The DEIS denies having any known Goshawk nesting territories on BLM lands (page 366). It should also review its forested areas for Pine Structural Stages of 3D, SS 4D and SS 5 and other relatively dense stands of trees, that it has on BLM land. Areas with potential for Goshawk post-fledging areas should be identified and it should discuss the closest know goshawk nest(s). It should have plans to protect the habitat for future movement of birds into your area as disturbance events and logging change availability of dense stands elsewhere on the Black Hills National Forest. It should have at least one alternative that is more protective of this species and some rules about protection of values. | The South Dakota Field Office has no knowledge of northern goshawks nesting on BLM lands. The RMP has timing restrictions and NSO stipulations in place to protect northern goshawks and other sensitive raptor species. The Forest Service has been contacted regarding locations of goshawk nests in proximity to BLM lands in the Black Hills and responded that the nearest documented nests are two miles or more away from BLM lands. |
| DR-MTDK-SD-13-0019-1 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Mountain Lion/Cougar We would like you to identify all lands under SD BLM's authority that could provide mountain lion breeding habitat and dispersal corridors. Please also consider nearby public, private and tribal lands, when evaluating habitat. We would like you to examine the Two Rivers Area (see Figure 3- 20 on page | Identification of lands not managed by BLM for mountain lion habitat has been addressed by GFP. It is beyond the scope of the RMP to provide management actions on surrounding lands not managed by BLM. There is not enough contiguous BLM land to support breeding populations of mountain lions, although |

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| | | | 443 of DEIS) for it's potential as breeding habitat for lions and as dispersal corridors. Please discuss any inventory for lions or lion sign you have done in this area.<br><br>We would like you to develop goals and objectives for BLM lands to provide breeding populations of cougars and dispersal habitat, (where you can support such). Please consider connections to existing and potential habitat on adjacent federal, tribal or other public lands. We ask you to consult with neighboring Tribes on their mountain lion management and objectives, not just SD's, ND's and Montana's Wildlife Agencies. | mountain lions may certain occupy and disperse through some BLM lands at times. Mountain lions require habitat suitable for ambushing prey species, and are dependent also on prey availability. Most of BLM's land is in open prairie land which is not typically suitable for mountain lion occupancy. Furthermore, BLM's focus on wildlife revolves around managing habitat rather than managing populations and the extent to which BLM manages mountain lions goes only as far as maintaining a healthy landscape for the benefit of multiple wildlife species, livestock, and other resource users. We have received no information during RMP scoping or the draft RMP comment period or other meetings that other organizations or agencies wanted BLM to address any of the items brought forward in the comment. Most of the discussion items in the comment are typically addressed by the State GFP. |
| DR-MTDK-SD-13-0019-3 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Prairie Dogs<br><br>The DEIS should declare what amount of prairie dogs are needed to support a viable population of burrowing owls. The DEIS should evaluate prairie dog's positive effect on ferruginous hawks and swift fox. The DEIS should evaluate all positive effects of prairie dogs. The DEIS should set a lowest amount of prairie dogs that is needed to adequately provide it's beneficial ecological role and allow that if that threshold is crossed, certain acts with respect to reducing prairie dogs will be limited or prevented. | The IDT Team acknowledges in the RMP the ecological importance of black-tailed prairie dogs as well as the significant reduction in prairie dog colonies from their original extent. There is evidence that swift fox do not actually rely heavily on prairie dogs as prey (due in part to differences between the species in activity during day vs night; Nicholson et al. 2006) but will den on prairie dog towns based on availability (Nicholson et al. 2006). Burrowing owls also use prairie dog towns for nesting but do not actually prey on prairie dogs.<br><br>There is no research that has concluded what amount of prairie dogs is necessary to support a viable population of burrowing owls. There are presently no black-footed ferrets on BLM lands in South Dakota, nor are any of the prairie dog complexes existing on BLM lands large enough to support a black-footed ferret population. |

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| | | | | Many species do prey on prairie dogs, however, and the IDT Team understands the importance of maintaining what prairie dog towns do exist on BLM lands.<br><br>Except under certain circumstances, the South Dakota Field Office does not allow, nor does it encourage, poisoning of prairie dogs on most BLM lands. BLM will consider treating up to 15% of prairie dog town acres under certain circumstances such as the spread of prairie dogs from BLM lands onto private lands resulting in extensive damage to private property. This is a good-neighbor allowance and is not a guarantee that 15% of prairie dog town acres will be treated. The intent of this direction is to provide consistency with GFP's Prairie Dog Management Plan and provide a means for BLM to limit liability for damages caused when prairie dogs expand from BLM lands to other lands and in some cases, address safety concerns. |
| DR-MTDK-SD-13-0020-5 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | We ask for a set back of at least 1 mile for Bald Eagles and Ferruginous Hawks. Raptor migration counts and Christmas Bird Counts have indicated a decline in Golden Eagle populations in western North America since the 1980s, especially in recent decades (Farmer et al. 2007). Golden Eagle populations are being closely examined by USFWS not only because their populations are unknown but also because of their sensitivity to disturbance. Especially in light of USFWS currently authorizing take permits only under "no net loss" • requirements, surface-disturbing activities should be prohibited within 1 mile of Golden Eagle nests. This 1 mile distance should also be applied to active raptor nests.<br><br>Furthermore, we recommend not limiting stipulations to active nests because inactive nest still identify areas | The buffers prescribed in the final RMP are consistent with what US Fish and Wildlife Service recommend for the bald eagle. Buffers for all raptors are given by the Montana/Dakotas State Office. Addressing the second part of this comment, while an inactive nest may indicate that there are favorable conditions present to support a breeding pair of raptors, it may also have been abandoned because conditions are no longer suitable. By providing a window of 5 or 7 years (depending on the stipulation), the RMP allows for raptors to rotate breeding areas or for one pair of raptors to replace another in a given territory. |

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| | | | containing quality combinations of nesting and foraging habitats that should be protected for use by future nesting raptors. | |
| DR-MTDK-SD-13-0023-6 | South Dakota Stockgrowers Association, Silvia Christen | Association | SD Stockgrowers is concerned about prairie dog management portion of this RMP. We appreciate the discussion about the importance of managing prairie dogs on BLM land and we acknowledge that prairie dogs on BLM land do not currently pose any threat to grazing. However, we are concerned that the RMP sets a limit of treatment only 15% of prairie dog acres. From experiences in other areas where prairie dog populations exploded, allowing treatment on only 15% of acres will likely not be adequate to manage populations if their populations increase drastically. We ask the BLM to consider setting a maximum or target number of acres of prairie dogs as a guide for management rather than a percentage of acres. | The preferred Alternative of the RMP allows for up to 15% of prairie dog acres to be treated per year. Considering that black-tailed prairie dogs only occupy 2% of their former range, reducing their acreage by up to 15% per year is a fairly generous allowable reduction as it applies to all prairie dog towns. Under this approach, given certain circumstances, entire dog towns could be treated in some areas as long as the 15% limit is not reached and damage to private property is occurring because of the spread of prairie dogs from BLM lands. It is important to note that the prairie dog towns that exist on BLM public land are much smaller compared to the Conta basin. In most cases, prairie dog towns on BLM lands are less than 100 acres in size with some dog towns as small as two to three acres. |
| DR-MTDK-SD-13-0027-29 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Ironically, the BLM's current management of interior least tern and piping plover habitat is perfectly adequate in the context of oil and gas leasing, but the proposed management in all other alternatives is not. Management Actions 29 and 31, DEIS at 101, 102. We support the prohibition, not the discretionary "avoidance," • of surface occupancy within ¼ mile of piping plover habitats. The management under Alternative A should be approved and be extended to all surface disturbing and disruptive activities, including powerline and renewable energy rights-of way as well as new road construction.<br><br>All alternatives contain the following mitigation measure for interior least tern nesting habitat: "NSO: ¼ mile from identified habitat (specific habitat not identified but potential exists)." • DEIS at 56. This approach is | Piping plover and least tern habitats are buffered with a 1/4 mi exclusion area for ROWs in the final RMP/EIS. As to the second part of the comment, the "no data" problem is a common one for many species on BLM lands. Part of the problem is lack of time, funding, and personnel, or some combination thereof, that prohibits exhaustive inventory of all species and habitats that exist on BLM lands. Interior least terns nest along major tributaries on shorelines, sandbars, and mudflats. BLM has very little surface ownership that would contain or support nesting interior least terns, and this is likely why little emphasis has been put towards inventorying potential habitat. If projects are proposed in areas that may support terns and plovers, inventory will be made for these species prior to initiation of project activities. Section 7 consulation with the Fish |

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| | | | nonsensical; how will these stipulations be applied if the location of tern nesting habitat remains unknown? It is part of BLM's responsibility under NEPA to generate baseline information, as this is necessary for a valid impacts analysis. Identifying interior least tern nesting habitat is part of this baseline information responsibility, and must be undertaken under this EIS. | and Wildlife Service is required if a federal action may affect a threatened or endangered species. |
| DR-MTDK-SD-13-0027-5 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | BLM Sensitive Species policy imposes additional requirements to provide baseline information. For BLM Sensitive Species, the agency is responsible for "Determining, to the extent practicable, the distribution, abundance, population condition, current threats, and habitat needs for sensitive species, and evaluating the significance of BLM-administered lands and actions undertaken by the BLM in conserving those species." • BLM Manual 6840.2(C)(1). Furthermore, the agency is responsible for "Monitoring populations and habitats of Bureau sensitive species to determine whether species management objectives are being met." • BLM Manual 6840.2(C)(3).. The BLM must make up for the absence of population status and trend data for BLM Sensitive Species by generating these data of its own accord where they are unavailable through state agencies or other external sources. | The BLM recognizes that it lacks thorough information on a number of sensitive species, and obtaining that information is an on-going and constant process. It is beyond the scope of the RMP to cover all species on an individual basis, and time and resources prohibit the South Dakota BLM from completing comprehensive surveys and studies of all sensitive species for inclusion in the RMP. |
| DR-MTDK-SD-13-0028-10 | The Wildlife Society, Silka Kempema | Wildlife Association | Recommendations from other states and research; Wyoming Fish and Game recommends a minimum of .6 mile! Direct and indirect effects of wind energy development on Sharp-tailed Grouse are largely unknown. | BLM has developed a two mile CSU buffer around sharp-tailed grouse leks in the Proposed Action in the Final RMP. |
| DR-MTDK-SD-13-0028-13 | The Wildlife Society, Silka Kempema | Wildlife Association | The golden eagle is covered under the Bald and Golden Eagle Protection Act the same as Bald Eagles. In this open country more than ¼ mile protection is needed. The USFWS, Wyoming recommends 0.5 miles for both bald and golden eagles. It is especially needed in this open | In the proposed action for the Proposed Final RMP, BLM provides for a 1/2 mile NSO and a 1/2 mile ROW restriction for bald eagles. A 1/4 mile NSO stipulations and 1/2 mile timing limit stipulation would apply to golden eagles as noted in other special status raptors in |

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| | | | country ecotone. More specifically, the USFWS (Wyoming) recommends to avoid project related disturbance and habitat alteration within 0.5-mile of bald eagle nests from the period of early courtship to post-fledging of chicks (January 1 through August 15), and golden eagles 0.5 miles January 15-July 31. | Table 2-2 and 2-3. BLM has coordinated with SD GFP and FWS on the RMP and have received no objections about these stipulations. |
| DR-MTDK-SD-13-0028-14 | The Wildlife Society, Silka Kempema | Wildlife Association | Protect all eagles the same; add golden eagle here under the "Eagle Protection Act" • golden eagles need the same protection as bald eagles in this open terrain). Literature states that eagles are very sensitive to visual line of sight impacts! | BLM has restrictions appropriate to the needs of each species. |
| DR-MTDK-SD-13-0046-15 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 3: Table 3-16 lists the BLM Sensitive Species that may occur within the planning area and includes the northern long-eared bat and the black-backed woodpecker. On page 362 under the section on Sensitive Species "“ Mammals, it states that the northern long-eared bat has "been identified during inventories in the Exemption Area" • but "no specific management actions exist for bats."□ On page 365 under Sensitive Species "“ Birds, there is no mention of potential impacts to special status migratory birds in forests and woodlands, including the black-backed woodpecker. We recommend that the FRMP/EIS evaluate potential impacts to both species and specific management actions be included for both species in the FRMP/EIS. For the northern long-eared bat, it could be appropriate to manage cave/mine entrances to minimize disturbances to hibernating bats in the Exemption Area. For black-backed woodpeckers, salvage logging after forest fires has been recognized to impact this species. Therefore, management of salvage logging in the Exemption Area could impact this species and merit discussions in the FRMP/EIS on how salvage loggings will be managed to ameliorate the impacts. | On page 651 in Chapter 4 it is stated: "*Bats:* All alternatives would utilize bat gates or other suitable structures to protect bat habitat and limit hazards associated with hazardous mine openings and caves. This would result in positive impact to bats over the long term for all alternatives." While this does not directed specifically for Northern long-eared bats, it is a measure of protection against the spread of white-nose syndrome, to which Northern long-eared bats are highly susceptible. Page 362 will be revised to reflect the management action of installing bat gates, etc. on mine openings and caves.<br><br>The RMP does provide general direction by applying restrictions on cutting snags and trees with old-growth characteristics. Many of the other concerns expressed about salvage logging in the Exemption area are more appropriately addressed at the project level as the condition of each forested site varies from one site to another and these conditions are constantly changing. Providing extremely specific management prescriptions in the RMP for a such a dynamic situation as mountain pine beetle infestations and forest health may be |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | counterproductive to overall forest health and under certain circumstances potentially adverse to the black-backed woodpecker. There is some evidence to show that black-backed woodpeckers ( and likely other species) will feed on pine beetle larva, especially in absence of recent burns. BLM will continue to coordinate with all key partners to properly manage pine beetle treatments while minimizing adverse impacts to wildlife and special status species. |
| DR-MTDK-SD-13-0046-16 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | Chapter 4, Special Status Species:<br>• Page 631. In the third paragraph on sensitive bat species and their habitat use, we encourage that the northern long-eared bat's use of forested areas be included.<br>• Page 632. The section on Forest and Woodland Species states, in reference to woodpeckers, "Specific management actions for special status migratory birds in forests and woodlands are proposed in the RMP . . . in the Forest and Woodlands Products section." • However ,we were unable to find any specific management actions for the black-backed woodpecker in the referenced Forest and Woodland Products section. | BLM has added additional language as suggested. Protection of habitat in mine audits, snag retention and management for a diversity of forest types are actions and goals that are included in the RMP to better manage habitat for these species. Site specific impacts of various projects would be addressed at the project level through a separate environmental review. |
| DR-MTDK-SD-13-0047-14 | State of South Dakota | State Government | On page 92, it mentions changing the buffer from 1/2 to 1/4 mile around eagle nests. Please explain the rationale for this change.<br><br>On page 92, golden and bald eagles are considered special status species but the management actions only recognize bald eagles. We suggest adding golden eagles.<br><br>On pages 92 and 366, the management actions do not recognize the protection of winter roosts for eagles as provided the Bald and Golden Eagle Protection. Why were these not included? | Under Management Action 1 on page 92, only Alternative B calls for a 1/4 mile buffer around bald eagle nests. The Preferred Alternative requires a 1/2 mile buffer. There is no change from 1/2 mile to 1/4 mile. The difference is between alternatives. Buffer distances and timing limits for raptor species were developed by the Montana/Dakotas State Office and provide adequate portion for both bald and golden eagles. If a raptor nest has been active 1 year out of 5, then it warrants protection with a buffer.<br><br>Riparian, floodplain, water bodies, NSO and CSU |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | On page 92, regarding raptor nests, what is meant by the verbiage? Does it mean active at least in 1 year within the last 5 years?<br><br>On page 93, we suggest that the bald eagle nesting season should be February through August. | stipulations provide protection of winter roosts for eagles by protecting most areas that produce large trees. Sensitive soils stipulations protect sharp buttes that may be used for roosting as these buttes are included in sensitive soil stipulations under the rock outcrop feature. For these reasons, any actions developed specially to protect eagle roosting areas would be duplicative and unnecessary. The weed control restriction does not identify bald eagle nesting periods, it only addresses when disturbance from weed control should be avoided. Because of plant growth patterns and accessibility problems in winter and early spring, weed treatments are not practical until after April 15 or later so changing timing limits for weed control to a period that starts as early as February is not necessary. |
| DR-MTDK-SD-13-0047-25 | State of South Dakota | State Government | On page 342 and 579, reference are made to the South Dakota ANS list. We suggest that this should be changed to the "South Dakota AIS Species of Concern" to match current terminology.<br><br>Table 3-13 also reference Zebra Mussels as collected in South Dakota. These have not been collected yet in South Dakota and USGS will be removing these from their NAS database.<br><br>On pages 17 and 345 we suggest adding pronghorn and river otters to the list of species-specific management plans developed by the state. | Page 342 was revised to reflect current terminology as found on the South Dakota Game, Fish & Parks web page. The wording on page 579 was left as is because the management plan developed by GFP is still called the "South Dakota Aquatic Nuisance Species Management Plan" despite changes in terminology apparent elsewhere in the agency's website. Table 3-13 was revised to reflect zebra mussels as "Not Present" rather than "Collected" in South Dakota. Finally, the pronghorn and river otter management plans were added to pages 17 and 345. |
| DR-MTDK-SD-13-0047-28 | State of South Dakota | State Government | On pages 16 and 348, we suggest adding the bald eagle, piping plover, and interior least tern to the list of GFP plans. Those can be found at http://gfp.sd.gov/wildlife/managernent/plans/threatenedendangered- missouri-river-plan.aspx | Page 16 states: "Management Plans for Threatened and Endangered Species on the Missouri River – South Dakota Game, Fish and Parks has developed a set of management plans for the four listed species that live along the Missouri. These species include the pallid sturgeon (SDGFP 2006b), bald eagle (SDGFP 2005c), |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | least tern (SDGFP 2005d) and piping plover (SDGFP 2005b)." Each of those plans is included in the list of GFP plans as stated by the above excerpt. Nowhere on page 348 does it list any of the GFP plans. |
| DR-MTDK-SD-13-0047-32 | State of South Dakota | State Government | On page 353, first paragraph, first sentence does the BLM special status species reference to "species of management concern" include those species of identified in the State Wildlife Action Plan as species of greatest conservation need?<br><br>On page 354, second paragraph references a ferret release on the Bad River Ranch. We suggest a citation be included regarding this release. | On page 353 it states: "BLM special status species include state listed, federally listed, proposed to be listed, sensitive, and candidate species. The State of South Dakota's sensitive species are given the designation of state listed or species of management concern. This designation applies to the State of South Dakota only. Montana/Dakotas BLM sensitive species are those species designated by the BLM State Director, usually in cooperation with the state agency responsible for managing the species. Species designated as Bureau sensitive must be native species found on BLM-administered lands for which the BLM has the capability to significantly affect the conservation status of the species through management[...]" The BLM does include species of management concern identified by GFP, although BLM's list may not contain every species of concern listed by the state due to lack of presence of a given species on or near BLM lands. BLM was informed of the intent of the Bad River Ranch to release ferrets on private lands on the Bad River Ranch approximately three years ago and met with the ranch manager prior to the release of ferrets. Adding a citation provides no added value to this sentence. This is just a simple statement of actions that occurred in the past. |
| DR-MTDK-SD-13-0047-36 | State of South Dakota | State Government | On page 363, Table 3-16 reference BLM Special Status Species. Why were management actions not developed for these in Table 2-2? | BLM maintains a list of numerous species considered Special Status to identify those species that may need special management considerations at the RMP planning level or at the project planning level. When needed, the Final RMP/EIS provides protections and |

**Table W-15**
**Comments Related to Other Special Status Species**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | other measures to manage and conserve individual special status species. In other cases, other management actions for a similar group of species provide adequate protection for the individual sensitive species because they use the same habitat. |
| DR-MTDK-SD-13-0047-7 | State of South Dakota | State Government | On page 45, the RMP references No Surface Occupancy stipulations for occupied bighorn sheep range, areas within 1/2 mile of sage-grouse leks, and areas within 1/4 of raptor nests and 1/2 mile bald eagles and peregrine falcons nest. Please provide the citation for these distances. | Stipulations were developed through research of the available literature sources by the Montana/Dakotas State Office for implementation by Field Offices. These stipulations were coordinated with the State of SD through cooperating agency involvement. The alternatives that propose various protective buffers were done so to provide a range of alternatives to be evaluated in chapter 4. Refer to chapter 4 and the bibliography for a list of references. |
| DR-MTDK-SD-13-0047-8 | State of South Dakota | State Government | On page 55, the RMP references stipulations for prairie grouse leks. Since we are unaware of a current census of prairie grouse leks, is the BLM planning to conduct such a survey? | BLM would like to undertake such a project; however funding is always an issue. Part of the reason for identifying this type of study is to demonstrate the need to fund this type of project internally and point out that a cooperative study effort with the state would be beneficial. |
| DR-MTDK-SD-13-0048-18 | Butte County Commissioners, Kim W Kling | Local Government | In mgmt 38, please remove the complete restriction of livestock grazing from this narrative on "Special Status Plants". At a minimum, the I.D. Team should include nonBLM technical membership from the range science community before a decision on grazing is made. | In the Proposed RMP of the Final RMP/EIS, BLM has provided the management flexibility to change or reduce grazing use in areas of special status plants if grazing use is adversely affecting these plants. Before this is done, all options would explored and a project level environmental review would be completed that would provide the public opportunities to participate in the planning process as required by regulations. IDT teams are established based on the resource values, uses, and conflicts present. Any member of the public is allowed to participate in the planning process if they request to be considered an interested party for a particular allotment or request to be involved in other project level planning efforts. |

**Table W-16**
**Comments Related to Paleontological Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0015-16 | Public Lands Advocacy, Claire Moseley | Consumer Group | No description of what constitutes "significant paleontological sites" is provided within the DEIS, leaving this stipulation ambiguous and open to broad interpretation. Does "significant" refer to sheer volume? Are common vertebrate fossils considered significant? Does the term apply only to new or rare vertebrate and invertebrate finds that can contribute to scientific discovery and discourse? We recommend that BLM provide a detailed definition of "significant paleontological sites" along with the parameters within which this stipulation would apply in order to eliminate the possibility of arbitrary application. | We added the following to the Glossary Section of the RMP. Please see definition from the Glossary below for Significant Paleontological Resource. Significant paleontological resource (also, significant fossil resource). Any paleontological resource that is considered to be of scientific interest, including most vertebrate fossil remains and traces, and certain rare or unusual invertebrate and plant fossils. A significant paleontological resource is considered to be scientifically important because it is a rare or previously unknown species, it is of high quality and well-preserved, it preserves a previously unknown anatomical or other characteristic, provides new information about the history of life on earth, or has identified educational or recreational value. The parameters within which this stipulation would apply are based on the Potential Fossil Yield Classification System at outlined in Chapter 3 and the potential presence of significant paleontological or fossil resources based on previous finds. |
| DR-MTDK-SD-13-0015-30 | Public Lands Advocacy, Claire Moseley | Consumer Group | Because the presence and quality of paleontological resources varies by site, flexible, discretionary management is needed based on case-by-case circumstances. Avoidance and mitigation practices may be implemented in Potential Fossil Yield Categories (PFYC) 4 and 5 (High and Very High Potential) areas in appropriate cases. PFYC 3 (Moderate or Unknown) surveys are unnecessary and overly burdensome. We urge BLM to adopt a flexible process similar to that described for Alternative B, in which required surveys would be appropriately confined to higher potential geological formations, and monitoring based on analysis of proposed project plans to determine need. | The classification system is intended to provide baseline guidance for assessing and mitigating impacts to paleontological resources. The classification is an intermediate step in the analysis and can be used to assess additional analysis needs. Classes 1, 2, and 3 are all units that have modest or no history of producing significant fossils, or are poorly studied and/or poorly documented. While significant paleontological or fossil resources are rare in Class 1 and 2 they are possible. Class 3 areas throughout the western portion of South Dakota have produced paleontological resources worthy of scientific study; however, this class also includes poorly studied units so that the potential yield cannot be assigned without ground reconnaissance. Management concern for paleontological resources in these units is moderate and cannot be determined from existing data. |

**Table W-16**
**Comments Related to Paleontological Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | Surface-disturbing activities may require field assessment or ground truthing on a case by case basis to determine a further course of action for protection of significant paleontological resources. Additionally, all ground disturbing projects should include an unanticipated fossil discovery plan to outline steps to be taken if resources are encountered regardless of the PFYC ranking. |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0003-1 | Branden Bestgen | Individual Consumer | I would like to see a concerted implementation of the 1996 Recreation Area ACEC Management Plan recommendations that pertain to recreational use of the Fort Meade Recreation Area. The City of Sturgis and Chamber of Commerce are aggressively pursuing the growth of outdoor recreation areas in our area. The Fort Meade Recreation Area is an important part of that growth potential. Several points listed in the 1996 plan have not been implemented, and would have a positive economic benefit to this region if they were. | The proposed action would implement the 1996 Fort Meade ACEC Management plan. Recreational plans outlined in the 1996 plan that have not been implemented would still be considered for implementation pending an up-dated project level environmental review. |
| DR-MTDK-SD-13-0008-1 | Dakotas Resource Advisory Council, Kevin Forrester | Association | The amendments must better reflect the management objectives, actions, and direction outline in the 1996 Fort Meade Recreation Area ACES Management Plan. Appendix 1 contains the individual points not fully address or completely disregarded in the 1996 plan. The travel management portion of all the options is unfunded, has no schedule and results in further delaying management actions outlined in the 1996 FMRA plan. As written the travel management directive will push decisions for marking the existing network of trails requested continually since the late 80's by multiple use recreation users, local government entities, and business groups beyond the quarter century mark. | The BLM recognizes that some of the proposals for trails were marked or constructed. The proposed action would implement the 1996 Fort Meade ACEC Management plan. Specific proposals from the plan along with new proposals would still be considered for implementation pending an up-dated project level environmental review. |
| DR-MTDK-SD-13-0010-1 | Black Hills Trails, Samuel Greear | Association | While the current draft includes a number of potentially positive changes for the area, all of the proposed alternatives fail in a number of ways.<br>- None of the alternatives provide implementation schedules.<br>- There are no budget allocations outlined in the plan. Without budget and staff allocations the document hardly constitutes a "plan", it is simply a collection of "ideas".<br>- The status of prior objectives (as outlined in the 1996 and earlier plans) and rationale or remediation plans for those objectives that have not been fully met have not | Land use plans are a preliminary step in the overall process of managing public lands, "designed to guide and control future management actions and the development of subsequent, , more detailed and limited scope plans for resources and uses" (43 CFR Part 1601.0-2). The RMP is not designed to be a budget or staffing document but provides general guidance and direction. Implementation varies depending on the action. Some actions/direction are implemented immediately after the Record of Decision is signed, others are implemented as activity (project) level plans |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | been identified or proposed. | are completed or renewed. Previous management plans guiding current direction are listed on Table 1-3, and remain in effect unless superseded by direction in the new RMP. |
| DR-MTDK-SD-13-0010-2 | Black Hills Trails, Samuel Greear | Association | In reviewing the prior Management Plan for the Fort Meade Recreation Area published in 1996 there are a number of things that stand out about the plan in contrast to the currently proposed draft.<br>- There are clear objectives.<br>- There are implementation schedules for those objectives.<br><br>A selection of objectives from the 1996 plan includes:<br>1. "B2-6 Construct a marked, fully accessible walking trail from Ft. Meade Museum to the Ft. Meade Post Cemetery to accommodate VA patients and museum visitors"<br>2. "B2-8 Establish and maintain a system of marked equestrian, hiking, and biking trails through partnerships with user groups. Where possible these trails should be designed for physical accessibility."<br>3. "Maintain and operate recreational facilities to a standard that protects the resource, the visitor, the public investment and promotes pride in public ownership."<br><br>While progress may have been made related to these objectives since the 1996 management plan was enacted there has been a clear failure to fully meet these and other objectives laid out in the plan. Our perception of the status of the above objectives follows:<br><br>1. An accessible walking trail at the Camp Fechner site simply does not exist. According to the Cost By Year table in the 1996 plan this objective should have been | As noted in the 1996 Plan D. Cost and implementation schedule "Actual implementation dates will depend on funding availability". The new plan, regardless of alternative selected, will carry the same caveat. While the management actions are the intent of the plan, funding is the mechanism which allows the programs to proceed. Priorities change from year to year, as well as from 1996 to 2014. |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | completed in 1999.<br><br>2. A system of marked trails does not exist. The Centennial Trail is the only marked trail on the Fort Meade Recreation Area. A single trail by no means constitutes a system of trails and the Centennial Trail as it exists in this area is less accessible, poorly maintained and poorly marked when contrasted with the same trail as managed by the US Forest Service on adjacent land. While other trails, possibly constituting a system, do exist on the Fort Meade Recreation Area they are not signed in any way and have generally poor accessibility. Per the 1996 plan a multiple use trail system should have existed from 1998.<br><br>3. Bureau of Land Management directed maintenance on trails and trail facilities is sub-standard and does not promote pride in public ownership. The public very often speaks of the incredible amount of "potential" that exists on the Recreation Area, but positive comments about the current state are uncommon. Very often actions are only taken in direct response to requests by Special Use Permit holders instead of pro-actively. | |
| DR-MTDK-SD-13-0011-33 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Hunting would be allowed according to state regulation and Outfitter/guide types of Special Recreation Permits may be issued. Priority for these permits where there is a conflict would be based on a first come basis. Trapping would be allowed according to state regulation and traps may not be within 50 feet of any road or trail, and 1000 feet of campsites, trailheads or dwellings.SD IWLA is curious about Outfitter/Guide Permits. Are these permits limited in number and areas of use and if so, an explanation is necessary.<br><br>SD IWLA is concerned that these Special Recreation | There has been no competition for permits, so currently the permits are not limited. If increased interest causes conflict then the first come priority would be utilized. The trapping restriction at Fort Meade was designed to protect the values of the ACEC. BLM has coordinated with the State of SD on trapping at Fort Meade. |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | Permits may be used in a manner that conflicts with the general public and we therefore ask that greater clarity be provided on BLM policy. In addition, the statements about trapping are contradictory to South Dakota codified law and SD GF&P Commission rules. This trapping policy sets up an unwarranted and unnecessary affront to compliance with State regulation and must be either revised or removed from RMP language. | |
| DR-MTDK-SD-13-0011-34 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | Fish stocking would be allowed. Increase fishing opportunities by development of ponds, such as a pond near the Homestake Powder houses, dependent upon water availability and dam constraints.<br><br>Fish stocking and regulation of fisheries in South Dakota is reserved to the State in statutory law and Commission Rule. A simple statement that fish stocking will be coordinated with and conducted by the State in accordance with all state laws and regulations is necessary here. | Additional wording inserted. |
| DR-MTDK-SD-13-0021-1 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | We also believe the document is totally deficient in discussion and analysis of back-country and primitive Recreation Setting Characteristics. Maps of these assignments for each alternative must be provided. This deficiency is compounded by the failure to provide maps of roads and maps of roads that are assigned road classes. | Road analysis will be completed during subsequent Travel Management Planning. |
| DR-MTDK-SD-13-0028-19 | The Wildlife Society, Silka Kempema | Wildlife Association | Pg 131MA #6 Alt B & Preferred<br><br>Hunting would be allowed according to state regulation and Outfitter/guide types of Special Recreation Permits may be issued. Priority for these permits where there is a conflict would be based on a first come basis.<br>b) Trapping would be allowed according to state regulation and traps may not be within 50 feet of any road or trail, and 1000 feet of campsites, trailheads or | In order to be consistent with state law the wording was changed. |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | dwellings.<br>This alternative is not consistent with state regulations. The 50 feet and 1000 feet guidelines are not in accordance with SDCL 41-08 and 41-09, Hunting and Trapping Seasons and Methods, Hunting and Trapping on Private Lands and Rights of Way. | |
| DR-MTDK-SD-13-0031-1 | Boone and Crockett Club | Association | We draw your attention to Page XVI and Page 32 that make the following statement: Specific areas may be closed to firearm shooting if health and safety issues arise, littering occurs, or conflicts with other resources or resource uses occur. We are requesting that the MOU Roundtable referenced above be notified when any such situation arises so that we may work with the BLM in resolving such issues at an early stage before they grow into a major management challenge.<br><br>Assistance that could be provided to the BLM through the MOU Roundtable may have the positive outcome of resolving a situation so that closure is avoided. The principal objective of the MOU is to prevent closures of Federal public land to hunting, fishing and recreational shooting and to seek opportunities for these activities. | Recreational use is one of the multiple uses of BLM managed lands and it would be preferable to manage conflicts while they are still minor. Where conflicts cannot be resolved the BLM must retain the ability to manage the resources and public use in a safe manner, including restrictions to use. |
| DR-MTDK-SD-13-0031-2 | Boone and Crockett Club | Association | By signing the MOU, we have pledged support to the BLM to assist in resolving problems that may arise with hunting and recreational shooting. One of the major initiatives of the Roundtable was building a partnership with Tread Lightly! Inc. to support the development of the Respected Access is Open Access outdoor ethics education campaign. The Respected Access campaign was initiated to address problems associated with recreational shooting, but has grown beyond that to the promotion of responsible stewardship associated with other recreation activities on public lands. We recommend that the campaign be woven into the final | Hunting and recreational shooting is discussed in the recreation section of chapter 2 and Chapter 3. Management of these activities is consistent with the respected access and tread lightly concepts. |

**Table W-17**
**Comments Related to Recreation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | RMP because the BLM is a partner in the Respected Access campaign. Further information and education material can be found at: http://treadlightly.org/programs/respect-access-campaign/ | |
| DR-MTDK-SD-13-0047-20 | State of South Dakota | State Government | On page 129, second bullet, it says that the BLM is going to emphasize recreational opportunities. Will this include marking boundaries and signage? | Signage and boundary marking needs would be assessed at the project level and prioritized in budget allocations. |

**Table W-18**
**Comments Related to Salable Minerals**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0015-6 | Public Lands Advocacy, Claire Moseley | Consumer Group | No clarification as to what constitutes a purported unacceptable level of change is provided in the DEIS. Further, what recourse will an operator have if it is believed such a requirement is excessive? | Not everything contained in procedures developed outside of a land use plan needs to be included in a land use plan. BLM will follow internal guidance developed from regulations, which are developed from laws. Operators can negotiate the solutions to unmitigated impacts, or an "unacceptable level of change", and appeal a decision if unsatisfied with the result, which would go to an administrative law judge. After that an operator still has legal options. |
| DR-MTDK-SD-13-0025-7 | United States Forest Service, Mary Erickson | Federal Government | How will the BLM address permitted removal of flat surface rocks, such as for landscape use, which provide reptile habitat especially on southerly aspects? | Issues such as these would be addressed in project specific environmental assessments when a proposal for sale of such rocks was submitted. We currently have no endangered lizards or snakes in our planning area for which we must be concerned regarding critical habitat. |
| DR-MTDK-SD-13-0047-21 | State of South Dakota | State Government | On page 154, it mentions special considerations regarding salable minerals. Please define situations involving special considerations. | Special considerations would essentially be mitigation measures developed from a NEPA document, such as an environmental assessment, which would be used in the form of conditions of approval to a permit. They would address topics like erosion control, revegetation, dust control, timing measures to reduce impacts to wildlife, waste disposal, etc. |

**Table W-19**
**Comments Related to Social and Economic Concerns**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0004-2 | Black Hills Multiple Use Coalition, Tom Troxel | Association | The GSG Initiative has the potential to greatly impact the current grazing systems on the Dakotas BLM acres. We urge the BLM to consider the importance of viable, sustainable grazing on the economic and social wellbeing of the State of South Dakota and the surrounding counties before moving forward with this Initiative. | BLM has considered the impacts of the alternatives on the social and economic values of local areas and has strived to balance the need to conserve sage-grouse with the need to maintain the social and economic well-being of local areas. The social and economic impacts are described in the social and economic sections of chapter 4. |
| DR-MTDK-SD-13-0007-22 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | (7) Environmental Justice<br><br>The Draft RMP/EIS states that five American Indian Reservations are located in western South Dakota: Pine Ridge (Oglala Sioux), Standing Rock (Dakota and Lakota Sioux), Cheyenne River (Cheyenne River Sioux), Rosebud (Rosebud Sioux), and the Lower Brule (Lower Brule Sioux). In addition, many other tribes in eastern South Dakota and adjacent states have aboriginal territories that overlap the planning area. Due to the tribal significance of the area, we encourage the BLM to continue consultation with the tribes during project level planning and analysis.<br><br>Additionally, the Draft RMP/EIS discloses that American Indians represent nearly 9% of the population in the state with a high percentage living in poverty. Depending on the county, the percentage of people living below the poverty level is as high as 18.6% compared to 14.2% for the entire state. The Environmental Consequences chapter of the Draft RMP/EIS states that no alternative will result in identifiable disproportionate effects specific to any minority or low income population or community. Given the demographics of the area and the potential impacts from certain RMP activities, we recommend additional environmental justice analysis in future project-level EISs. | Coordination with area tribes would continue at the implementation level. BLM will continue to consider environmental justice when environmental reviews are completed in the future. |

**Table W-19**
**Comments Related to Social and Economic Concerns**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0020-3 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Grazing Economics<br><br>Please discuss the cost grazing permitees/leasees pay for AUMs and what the comparable rate on private lands would be. What is the subsidy per AUM that your private participants receive. Does the federal government return part of that fee to grazing improvements on the lessee's land? Does the fee cover the cost of your monitoring and enforcement.? Please indicate the number of permitees or leasees and the total number of AUM's run. Please calculate the average subsidy per permitees using your federal grazing privileges and the total subsidy that BLM offers via cheap forage. Please calculate the annual revenue lost to the BLM by below cost grazing privileges. Please discuss the competition and fair market issues to other ranchers who don't have base property, if your forage is sold cheaper than private forage. | Grazing fees may change each year and are currently $1.35 per AUM. Private land fees also vary each year. The number of AUMs is explained in chapter 3 and in Table 2-2. Much of the information on private land grazing fees and other information can be obtained from the National Ag. Statistic Service. |
| DR-MTDK-SD-13-0020-4 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please discuss proximity of your allotments to reservations. Please discuss the discrimination or racism inherent in your federal grazing system. What percent of your lease holders are Native American? If none are, please consider this an environmental justice issue, in that benefits are unfairly distributed between majority and minority | Refer to Chapter 1 grazing section of Chapter 3 for locations of Allotments. With a few exceptions, BLM grazing allotments in SD, are not located directly adjacent to Reservations. Leases are issued to those that meet the qualifications regardless of race. The SD Field Office does not collect information about race when grazing authorization are applied for or issued. The alternatives developed in the RMP do not result in favor or bias to any group or race. Refer to Environmental Justice section of Chapter 3 for more details about Environmental Justice. |
| DR-MTDK-SD-13-0030-16 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | Agricultural statistics often overestimate the value of public lands ranching to local economies. The number of permittees and full-time ranchers is often extremely inflated. In fact, "the elimination of all public lands livestock grazing would result in a loss of 18,300 jobs in agriculture and related industries across the entire | The RMP addresses the numbers of jobs associated with ranching for South Dakota only, not the 11 western states. The article from Thomas Powers was reviewed and much of it addressed the dependence of forage from Federal land. Unfortunately the article did not take into account that many livestock that are |

**Table W-19**
**Comments Related to Social and Economic Concerns**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | West, or approximately 0.1 percent of the West's total employment."81 For further information on the significance of federal public lands grazing to employment and economies in the West generally, see Thomas Power's article, Taking Stock of Public Lands Grazing: An Economic Analysis. available at http://www.publiclandsranching.org/htmlres/wr_taking_stock.htm. | raised on Federal lands are not sold in the same state that they were raised in, so a direct comparison of forage provided from Federal land in one state to the livestock sales in the same state does not produce meaningful information at a state level. This article addressed only the 11 western states and did not include South Dakota. |
| DR-MTDK-SD-13-0030-17 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | In the Monument RMP, the comparison of social and economic values should demonstrate a clear understanding of the conflicts between grazing and other uses of public lands. | This comment is not specific to the SD RMP and appears to address another RMP. |
| DR-MTDK-SD-13-0030-18 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The current grazing utilization level is unsustainable, and restoration of the land will require costly action by the BLM. A thorough economic calculation must consider the value lost from negative environmental impacts to: water quality and quantity, wildlife habitat quality and quantity, and native vegetation. The costs of further exotic species and weed expansions, diminished recreational opportunities, potential species loss, intrinsic land value, and beauty must also be calculated | Stocking rates in the planning area are set at a very conservative rate with approximately 3/4 of the forage allocated to wildlife and watersheds needs. This is considered sustainable in the long term. See the livestock grazing discussion in chapter 3. Economics impacts are discussed in the economics section in Chapter 4.<br><br>Refer to the Social and Visual Resource Management sections of chapter 3 and 4. Many values such as ascetic values and quality of life are difficult to quantify but are discussed in these sections. |
| DR-MTDK-SD-13-0048-23 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 295 - Please explain how the quality of life of permittees, ( actually lessees, not permittees), will be enhanced by the Preferred Alternative? The RMP clearly conveys an intent by the BLM to be more restrictive on multiple uses in Alternative "D" over Alternative "A". How can a more restrictive BLM enhance the quality of life for ranchers or improve the economic situation in the County? | This section was reviewed and it does not state that the quality of life for lessees would be better under Alternative D compared to Alternative A. |

**Table W-20**
**Comments Related to Soil Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0007-11 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Sediment and Nutrient Analysis<br><br>The 2012 South Dakota Integrated Report for Surface Water Quality Assessment states that sediment and nutrients conveyed in surface water runoff are the main nonpoint source pollutants impacting South Dakota lakes and reservoirs. We recommend that the Final RMP/EIS include an analysis of the impacts from sediment and nutrients on all types of waterbodies.<br><br>Because sediment loading has already caused impairment of numerous waterbodies in the planning area, and future activities that may be authorized under this RMP, including oil and gas development, livestock grazing and mining would result in new surface disturbance that may contribute to erosion, it is important the Final RMP/EIS include additional information about this concern. Erodible soils represent a significant source of pollutants in the planning area. For this reason, we recommend the Final EIS include a map depicting areas of steep slopes and fragile or erodible soils and proximity to surface waters. Depending on a host of variables including soil characteristics, industrial operations and topography, associated runoff could introduce sediments as well as salts, selenium, heavy metals and other pollutants into surface waters. To fully disclose and, if necessary, mitigate the potential impacts or soil disturbance, we recommend that the Final RMP/EIS include an estimate of erosion rates, by alternative, in areas where fragile or erodible soils are present. For example, the Wyoming BLM's Bighorn Basin Draft RMP/EIS estimated erosion rates based on projected amount of surface disturbance, types of surface disturbance and general characteristics of the basin (erodible soils, slopes, etc.). Erosion rates were | In nearly all cases, BLM manages less than 1% of the lands in the watershed of major stream and river systems. BLM-administered land directly along stream and river systems in the planning area are limited to less than 1/2 of 1% of each system. Any attempts to quantify nonpoint source runoff would need to include other lands to provide meaningful quantification and consideration of other lands across the 49 million acres of other lands within the planning area. BLM has addressed non-point source pollution through a variety of means including implementation of Standards for Rangeland Health, soil mitigations measures, reclamation guidelines, Best Management practices and actions within the alternatives to limit uses in areas of sensitive soils. The criteria BLM used to identify sensitive soils considers erodibility and steep slopes and BLM has mapped these areas, however these maps are highly complex and difficult to portray at the planning area scale -which includes all of SD - so they have been included with the project file with the GIS data posted on the SD RMP website. The acres of short term and long term soils disturbance is estimated over the life of the plan as shown in the soils section of Chapter 4. Because of the limited level of surface disturbance projected, erosion rates would not vary significantly between alternative. |

**Table W-20**
**Comments Related to Soil Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | calculated using the Water Erosion Prediction Project model (WEPP), a web based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://ars.usda.gov/Research/docs.htm?docid= 10621. We recommend that the BLM consider using this model or another appropriate model. | |
| DR-MTDK-SD-13-0048-26 | Butte County Commissioners, Kim W Kling | Local Government | We also do not agree with, and request documentation to support statements in the RMP, that "Potential impacts to soil resources can be qualitatively evaluated by the amount of land available to grazing and the number of AUM's available on those lands". This is generalization that has no basis in the range science literature and it expresses a negative bias towards proper livestock grazing. We request its removal from the RMP.<br><br>Pg. 515 - The statement in the second paragraph that draws a conclusion that .5% of BLM's soil resources are adversely impacted by livestock grazing should be removed. In South Dakota, the BLM has 5 Rangeland Health Standards. Only one of these Standards applies to the soils resource. The statement in this paragraph that 1400 BLM acres do not meet one or more of these Standards does NOT mean that all 1400 acres have adverse impact to soils. | The referenced sections were deleted from the RMP/EIS. |

**Table W-21**
**Comments Related to Travel Management**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0008-3 | Dakotas Resource Advisory Council, Kevin Forrester | Association | Non-motorized winter recreation should be promoted on BLM lands located in the "exemption Area" • . Fire has created many openings that should be maintained to prevent regeneration of trees and brush. These areas located in the snowiest parts of the Black Hills are extremely rare due to the adjacent public lands being too overgrown for use by skiers, and sled riders. The close proximity to US Highway 385 provides easy access for winter recreation. Due to their unique location these areas need to remain free of any possible winter closures due to the South Dakota Game Fish and Parks proposed release of Bighorn Sheep. | Non-motorized recreation is not restricted by the RMP, except in areas where there is a concern for public safety. Multiple use mandates allow future discussions on the trade-off between winter needs of Bighorn Sheep and recreation use and effects through project level planning. The RMP does not include a winter closure for Bighorn Sheep. |
| DR-MTDK-SD-13-0025-10 | United States Forest Service, Mary Erickson | Federal Government | Transportation proposal - We would prefer your allowance under Alternatives A and B for travel of 300' off of designated roads to be consistent with our Sioux TMP instead of the 100' proposed under Alternative D. | This has been changed to read 300 feet for camping, to be consistent with other federal lands nearby. |
| DR-MTDK-SD-13-0038-1 | Aletha Hoogeterp | Individual Consumer | My one remaining concern is the 100 foot limit on motorized travel off road for big game retrieval and dispersed camping. This limit would further restrict the 300 foot access that is currently allowed under the current Travel Management Plan and would cause a conflict with the Travel Management Plan. I feel that in order to avoid the further time delays and expense that would be caused by having to go through the process of changing the Travel Management Plan, you should change your Alternative D to allow the existing 300 foot motorized access for big game retrieval and dispersed camping. | Alternative D prohibits cross-country motorized travel to retrieve big game (pg 137). This prohibition is in agreement with the 2003 OHV Plan Amendment. It has been changed to read 300 feet for camping, to be consistent with other federal lands nearby. |
| DR-MTDK-SD-13-0045-2 | United States Forest Service, Dennis Aeger | Federal Government | We recognize that conditions on BLM-administered lands may present different opportunities and challenges than those on National Forest System (NFS) lands due to topography, vegetation, etc., but in general we believe that promoting consistency in management across boundaries to the extent possible will make it easier for | In the preferred alternative this distance has been changed from 100 feet to 300 feet for camping, to be consistent with other federal lands nearby. |

**Table W-21**
**Comments Related to Travel Management**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | the public who visit and use adjacent lands administered by different agencies. The Black Hills Travel Management Plan decision allowed motorized vehicle use for dispersed camping within 300 feet of certain designated Forest roads where motorized vehicle use is allowed. As such we believe the provisions in the Draft RMP/EIS Alternatives A and B allowing motorized cross-country travel within 300 feet of the nearest road to access campsites would provide the most consistency for public recreationists across the larger Black Hills area. For your convenience we note that the Forest's travel planning documentation including the Record of Decision is available on-line at http://www.fs.usda.gov/wps/portal/fsinternet/projects/blackhills/landmanagement/projects?sortb v=08zarchive=0 | |
| DR-MTDK-SD-13-0047-3 | State of South Dakota | State Government | The State of South Dakota is very interested in maintaining established access routes within the management area. Many of lands under the jurisdiction of the Commissioner of School and Public Lands rely on BLM road and trails for access. Many private ranchers use these roads and trails on a regular basis to conduct daily activities vital to their ranching operations. Additionally, many outdoor recreationalists rely heavily on these roads and trails to access large complexes consisting of state lease Walk-In Areas, BLM, and School and Public Lands for the purpose of hunting and other outdoor recreation. We encourage the BLM to engage the state and local private citizens prior to adopting any future projects that might impact access within BLM managed lands. | Specific Travel Management Plans will be developed to manage access. Under **Highlights of Management Actions Common to All Alternatives** (pg. 32) the third bullet states " The BLM will continue to work in coordination with federal, state, and county agencies, tribal governments, lessees, private landowners, and organizations" |
| DR-MTDK-SD-13-0048-12 | Butte County Commissioners, Kim W Kling | Local Government | In the second paragraph from the bottom, pg. 45, will BLM try to restrict motorized cross-country travel across BLM lands if that person is going to private lands to retrieve downed big game animals? Will this RMP apply | In **Highlights of Management Actions Common to All Alternatives** it states "Motorized cross-country travel will be allowed for BLM grazing lease holders if the travel is essential to administer the lease, provided it |

**Table W-21**
**Comments Related to Travel Management**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | additional restrictions to the use of motorized vehicles by grazing lessees? Please clarify these questions in the RMP. | does not result in resource damage or wildlife disruption". It does go on to state that the BLM may limit or prohibit administrative cross-country travel ... to limit impacts to resources. |

**Table W-22**
**Comments Related to Tribal Interests**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0005-1 | Jace DeCory | Individual Consumer | This decision did not take into account the oral history of Native Indigenous folks in the Black Hills region. On p. 376 it makes a reference that the Lakota did not inhabit the area until late 18th century/ 1700's. According to our Lakota oral history, the Lakota emerged from Unci Maka, Grandmother Earth and have always been associated with this region. The document should clarify that, "According to non- Native history..." • etc. | Based on your information of Native Indigenous oral history, we added information in Chapter 3 to clarify this information. The following has been added under the Historic Overview section:<br><br>*According to academic research of archaeological, ethnographic, and historic records*, human history in what is now South Dakota began with the Paleo-Indian period, dated at 12,500 to 7,000 radio carbon years ago (Holliday 1999). A sentence was added to the Sacred and Traditional Use Sites in South Dakota section:<br><br>Tribal consultations are required to identify places actively used or valued by today's American Indians in the area. Archaeological and ethnographic information indicates that Indians from the Crow, Cheyenne, Lakota, Dakota, Nakota, Assiniboine, Hidatsa, Mandan, Arikara, Kiowa, Kiowa-Apache (Naishan Dene), Omaha, and Ponca nations have lived within what is now South Dakota. Tribal oral history pertaining to the prehistory and history of South Dakota differ from the Historic Overview presented above. |

**Table W-23**
**Comments Related to Vegetation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0006-5 | Defenders of Wildlife, Mark Salvo | Wildlife Association | The SD DRMP/EIS asserts that management actions in the preferred alternative "would provide the greatest level of protection on BLM-administered lands" • (674), even more than the conservation alternative (Alt. C). Such a contention is illogical. 2 As the plan notes elsewhere, Alternative C would designate larger PPAs (see Table 1 in these comments), close BLM-administered surface and subsurface acres to fluid minerals development in PPAs (673); close the areas to other forms of mineral development and recommend them for withdrawal (657); exclude rights-of-way in PPAs (657); and provide greater protection for sage-grouse outside priority habitat (58-59, Table 2-1). In comparison, land use prescriptions in the preferred alternative are more flexible and could allow more development in sage grouse priority habitat (57-59, Table 2-1). | The statement was modified based on the comment. |
| DR-MTDK-SD-13-0018-8 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | SNAG DEPENDENT SPECIES<br><br>DEIS should discuss it's snag retention policies and how it provides for species in forested ecosystem that need snags for nesting and or forage. It should discuss how it provides for large diameter snags. It should have some rules about protection of these values.<br><br>DOWNED MATERIAL<br><br>The DEIS should discuss sensitive and other at risk forest species that need downed litter on the ground and discuss how BLM provides for and protects this habitat. | Refer to chapter 2 Table 2-2 Vegetation and Forestry and Woodlands sections for snag retention information. Sensitive species, State rare species and all other wildlife species that use forest environments are discussed in Chapter 3 and 4. Overall, the amount of snags and downed material in the Black Hills National Forest has increased as a result of mountain pine beetle infestations. The needs of forest species will continue to be considered when project level environmental reviews are considered in the future. |
| DR-MTDK-SD-13-0028-18 | The Wildlife Society, Silka Kempema | Wildlife Association | This alternative needs to state how you will determine the "not to exceed 50%" • (weight, ocular, etc.?) on herbaceous forage plants. Define pasture-wide basis. BLM also stated above in objective 1, "Utilization | Pasture wide basis refers to a pasture within a grazing allotment and is stated here to clarify it would be measured in pastures with an allotment. Monitoring would focus on Allotments with high value resources |

**Table W-23**
**Comments Related to Vegetation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | would be monitored (within staffing capabilities and budget) to gauge effectiveness of management." • The frequency and what type of monitoring will occur needs to be addressed in this alternative! | or those that allotments where high levels of utilization are noted. Refer to Table 2-2 for details about monitoring. |
| DR-MTDK-SD-13-0046-17 | US Fish and Wildlife Service, Terry Quesinberry | Federal Government | We recommend that, in the section on Forest and Woodland Products, potential impacts to the black-backed woodpecker and northern long-eared bat be identified and evaluated since both species utilize forested habitat. | BLM has added additional language as suggested. Protection of habitat in mine audits, snag retention and management for a diversity of forest types are actions and goals that are included in the RMP to better manage habitat for these species. Site specific impacts of various projects would be addressed at the project level through a separate environmental review. |
| DR-MTDK-SD-13-0047-10 | State of South Dakota | State Government | On page 77, Alternative D mentions the conversion of native vegetation to tame vegetation. We request that the conversion of any native rangeland vegetation be avoided. | As discussed in the RMP, native vegetation would not be converted to other species unless an overall benefit to wildlife would occur by allowing BLM to defer livestock grazing in important habitat. The amount that could be converted would be limited to 1% of the planning area. |
| DR-MTDK-SD-13-0047-26 | State of South Dakota | State Government | On page 345, the RMP mentions several citations regarding grassland trends. Some additional citations include: STEPHENS, S. E., WALKER, J. A., BLUNCK, D. R., JAYARAMAN, A., NAUGLE, D. E., RINGELMAN, J K. and SMITH, A. J. (2008), Predicting Risk of Habitat Conversion in Native Temperate Grasslands. Conservation Biology, 22: 1320-1330 and CHRISTOPHER K. WRIGHT AND MICHAEL C. WIMBERLY (2103), Recent land use change in the Western Corn Belt threatens grasslands and wetlands, PNAS 2013 ; 2013, doi:10.1073/pnas.1215404110 | These references were considered. |
| DR-MTDK-SD-13-0048-20 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 199- Please explain the column that says only, " 3 range improvements /year" ?? | This is the average number of new range improvements that are constructed and funded in whole or in part through BLM funds each year. The number is not a limit on range improvements, but rather it is just the average number of improvements that are constructed. The number of improvements |

**Table W-23**
**Comments Related to Vegetation**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | | that is listed does not include cost share range improvements funded by other agencies. |

**Table W-24**
**Comments Related to Visual Resources and Forestry**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0004-4 | Black Hills Multiple Use Coalition, Tom Troxel | Association | The BHRMUC has serious concerns with the Visual Resource Management (VRM) required in Alternatives B, C, and D. Again, we point to the unique nature of Dakota BLM tracts that are intermingled with State and private deeded property. Requiring strict VRM standards on these intermingled BLM lands will be extremely burdensome for the lessees, create additional workloads for the BLM staff, and most significantly, provide little in the way of enhanced value or benefits. | VRM standards do apply to BLM managed lands and are required by NEPA (1969), FLPMA (1976) and BLM Policy (Manual Section 8400). The VRM standards provide a methodology to protect the visual resources that are important to private land owners and the public interest alike. |
| DR-MTDK-SD-13-0009-1 | Linda Gilbert | Individual Consumer | Visual Resource Management: Due to the intermingled nature of lands in Harding County, I am concerned with Alternatives B, C and D. If the lessees are required to meet strict requirements for VRM while the land lies within deeded lands, it becomes a difficult task. | VRM standards do apply to BLM managed lands and are required by NEPA (1969), FLPMA (1976) and BLM Policy (Manual Section 8400). The VRM standards provide a methodology to protect the visual resources that are important to rancher and the public interest alike. |
| DR-MTDK-SD-13-0020-6 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | You need to revise your direction for salvage logging due to the need of the Black-backed Woodpecker for post-fire snags. We believe 2 snags per acre is not sufficient, please provide an alternative with greater snags per acre and different direction on salvage logging. | Two snags per acre is a minimum number, and there is no maximum. Specific projects may be planned so as to leave a greater number of snags, especially in post burn scenarios that provide the most favorable habitat for black-backed woodpeckers. |
| DR-MTDK-SD-13-0023-4 | South Dakota Stockgrowers Association, Silvia Christen | Association | SD Stockgrowers has serious concerns with the Visual Resource Management (VRM) required in Alternatives B, C, and D. Again, we point to the unique natural of Dakota BLM tracts that are intermingled with State and private deeded property. Requiring strict VRM standards and compliance on these intermingled BLM lands becomes extremely burdensome for the ranchers who manage the acres and creates additional workloads for the BLM staff. Additionally, it does little to enhance the landscape as the State and private properties do not have these same requirements. Camouflaged water well on BLM land next to a bright white water well on private land is hardly worth the paperwork that will be required of lessees and of BLM staff. | VRM standards do apply to BLM managed lands and are required by NEPA (1969), FLPMA (1976) and BLM Policy (Manual Section 8400). The VRM standards provide a methodology to protect the visual resources that are important to rancher and the public interest alike. |

**Table W-25**
**Comments Related to Water Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0005-2 | Jace DeCory | Individual Consumer | Most academic and public informational materials do not use Wikipedia as a reliable source for documentation. On p. 423 it was used as a reliable source for the water injection definition. Perhaps using a different more reliable source instead of Wikipedia. | Change made in the dialogue box with a different reference. |
| DR-MTDK-SD-13-0007-10 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Surface Water Resource Characterization<br><br>Table 3-11 of the Draft RMP/EIS includes information on impaired water bodies on BLM land in South Dakota based on South Dakota's 2010 Clean Water Act (CWA) Section 303(d) Impaired Waters List. It appears that some of the information regarding probable impairment types and probable impairment sources is missing. We recommend that the Final RMP/EIS be updated to include the missing information regarding probable impairment types and probable impairment sources. We also recommend that the Final RMP/EIS reference South Dakota's 2012 Clean Water Act (CWA) Section 303(d) Impaired Waters List, as approved by the EPA. It would be useful for the final RMP/EIS to discuss water quality trends observed between 2010 and 2012 to more fully describe current conditions in, and downstream of, the planning area. Additionally, we recommend the Final RMP/EIS describe the current water quality conditions, if available, for each surface water body in the planning area, including perennial, intermittent and ephemeral streams, rivers, lakes, reservoirs; and surface water drinking water sources.<br><br>A detailed map showing all impaired waterbodies within the planning area, as well as impaired waters downstream of the planning area, would be a useful tool in the Final RMP/EIS to convey the latest available information regarding existing water quality. For ease of identification, we suggest adding waterbody segment 10 | The information about impaired streams has been updated in the Final RMP/EIS to reflect changes in impairment status and sources. In nearly all cases, BLM manages less than 1% of the lands in the watershed of major stream and river systems. BLM administered land directly along stream and river systems in the planning area is limited to less than 1/2 of 1% each system. Rather than list the current status of water quality in each reach of each stream and river in the entire state of South Dakota (the planning area) we have summarized this information for those streams and rivers on or near BLM administered lands in the water resources section of chapter 3 and referenced the State Water Quality and impaired stream 303 (d) list in the SD Dept. Envir. and Res. water website and referenced the other sites that provide this type of information include the State's water quality website<br><br>http://denr.sd.gov/des/gw/groundprg.aspx and DENRs water quality monitoring networks website and http://denr.sd.gov/des/sw/wqmonitoring.aspx and the EPAs water quality assessment report for SD at http://iaspub.epa.gov/waters10/attains_index.control?p_area=SD USGS site http://sd.water.usgs.gov/ |

**Table W-25**
**Comments Related to Water Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| | | | numbers to the table of CWA Section 303(d) waters. In addition, if SDDNR has not assessed the water quality in all waterbodies within the planning area, then we recommend that the Final RMP/EIS list such waterbodies and indicate that the water quality condition has not yet been assessed by SDDNR. | |
| DR-MTDK-SD-13-0007-11 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Sediment and Nutrient Analysis<br><br>The 2012 South Dakota Integrated Report for Surface Water Quality Assessment states that sediment and nutrients conveyed in surface water runoff are the main nonpoint source pollutants impacting South Dakota lakes and reservoirs. We recommend that the Final RMP/EIS include an analysis of the impacts from sediment and nutrients on all types of waterbodies. Because sediment loading has already caused impairment of numerous waterbodies in the planning area, and future activities that may be authorized under this RMP, including oil and gas development, livestock grazing and mining would result in new surface disturbance that may contribute to erosion, it is important the Final RMP/EIS include additional information about this concern. Erodible soils represent a significant source of pollutants in the planning area. For this reason, we recommend the Final EIS include a map depicting areas of steep slopes and fragile or erodible soils and proximity to surface waters. Depending on a host of variables including soil characteristics, industrial operations and topography, associated runoff could introduce sediments as well as salts, selenium, heavy metals and other pollutants into surface waters. To fully disclose and, if necessary, mitigate the potential impacts or soil disturbance, we recommend that the Final RMP/EIS include an estimate of erosion rates, by alternative, in areas where fragile or erodible soils are present. For example, the Wyoming | Quantitatively evaluating soil erosion, transport, and sedimentation requires very specific information regarding soil types, slope characteristics, vegetation, type of disturbance, and mitigation. Attempting an analysis at this scale, without knowing the specific locations of disturbances, would be highly speculative. It would also provide unreliable information as there is a great deal of variability for both soil and landscape characteristics at this scale. The recommended model (WEPP) was designed to be run for "field-sized" areas (defined as 640 acres). Modeling an entire field office would greatly exceed the recommended modeling domain bringing further unreliability into the analysis. In summary, a quantitative analysis at this scale would be highly subjective and would yield highly unreliable results. This type of quantitative analysis is appropriate at a project level where specific actions and locations are known.<br><br>At this scale we can, and did, provide a qualitative analysis that provides perspective as to the range and magnitude of potential soil impacts. The analysis looked at the total amount of potential disturbances in the entire area and found only a very small portion of the analysis area would be disturbed. It also found that the use of management practices such as standards (our upland land health standard), guidelines, and mitigation measures (i.e. alternative design features, oil and gas leasing stipulations, and BMPs) would further reduce |

**Table W-25**
**Comments Related to Water Resources**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | BLM's Bighorn Basin Draft RMP/EIS estimated erosion rates based on projected amount of surface disturbance, types of surface disturbance and general characteristics of the basin (erodible soils, slopes, etc.). Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a web based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://ars.usda.gov/Research/docs.htm?docid= 10621. We recommend that the BLM consider using this model or another appropriate model. | potential impacts to soils. The EIS clearly presents the differences in potential impacts between alternatives and activities.<br><br>While project area water bodies have been impacted by non-point source pollution this analysis concluded that BLM authorized activities should maintain or restore water quality. This is required by the proposed water quality land health standard. In addition, our use of watershed function (managing our uplands and riparian areas to be in Proper Functioning Condition - PFC) should allow us to take corrective action prior to non-point source pollution related water quality impacts. The use of watershed function has been identified as an early indicator for managing non-point source pollution (Aron et.al. 2013). In addition to the water quality, upland, and riparian land health standards several design features were included in the alternatives that would protect soil and water quality from authorized activities. The EIS clearly presents the differences in potential impacts between alternatives and activities.<br><br>In summary, the qualitative analysis completed for the RMP is sufficient given the lack of site specific information available at this time and at this scale. As described in the EIS we believe that management actions that avoid impacts (e.g. oil and gas stipulations), keep disturbances at acceptable levels (e.g. mitigation and land health standards), and maintain watershed function (e.g. land health standards) would be sufficient to maintain soil and water quality. To ensure that BLM authorized activities are in compliance with all applicable laws and standards we will conduct additional site specific analysis prior to approving activities that could impact soils or water quality. This |

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| | | | | analysis could include running the WEPP model. |
| DR-MTDK-SD-13-0007-12 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Surface Water Impacts and Mitigation<br><br>Contaminants from surface events such as spills, pit and pipeline leaks, and nonpoint source runoff from surface disturbance have the potential to enter and impact surface water resources if these events occur in close proximity to water bodies. If surface activities are set back from the immediate vicinity of surface water wetlands, and designated source water protection zones. This provides an opportunity for accidental releases to be detected and remediated before impacts reach water resources. If accidental releases are not detected, the; setback provides a safety factor and some possibility of natural attenuation occurring. Setbacks also help prevent nonpoint source pollutants such as sediments from impacting surface waters. | BLM has No Surface Occupancy stipulations for oil and gas operations with 300 feet setback from floodplains of major rivers, water bodies, and streams; and also, within 1/4 mile of reservoirs with fisheries. Thank you for your comment. |
| DR-MTDK-SD-13-0007-13 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Oil and Gas Leasing Stipulations to Protect Water Resources: The Preferred Alternative includes water resources protections through oil and gas leasing stipulations. Specifically, the Preferred Alternative proposes the following NSO stipulation: "No Surface Occupancy: Riparian areas, wetlands, 100 year floodplains of rivers and streams and water bodies and areas within 300 feet of these features would be managed as No Surface Occupancy and Use for oil and gas leasing. At the implementation level any proposed projects that are located in areas identified as a 100 year floodplain (currently defined by "flooded soils" in the NRCS data set) would be evaluated for features that the stipulation is designed to protect and the stipulation applied when such features arc present." There is an exception to the stipulation that reads, "The Authorized Officer (AO) may grant an exception to this stipulation if | We have removed the reference to "and areas within 300 feet of these features for this NSO stipulation", for consistency with other RMPs**.** Oil and Gas Order Number 1, Approval of Operations allows for the movement of proposed wells by up to 660 feet (200 meters), which is used frequently to protect sensitive resources. Studies cited indicate that a 300 feet buffer maintains water quality by significantly reducing concentrations of fecal coliform, nitrogen, phosphorus, sediment, and pesticides. The 300-ft buffer provides a high level of protection by creating a buffer that extends from the boundary of the wetland or riparian area, not just the edge of the stream. There is no indication that increasing the width of the buffer to 500 feet or 750 feet will result in commensurate improvements to water quality. Our judgment is that including "intermittent and ephemeral" with streams, and "springs", is not |

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| | | | the operator can demonstrate that the proposed action would not adversely impact wetland or riparian function or associated water quality." We have the following recommendations regarding the NSO stipulations:"<br><br>• We recommend further clarification to the "streams" language by including intem1ittent and ephemeral streams in the list of water resources to be protected by the NSO stipulation."<br>• We recommend adding "springs" to the list of water resources protected by these stipulations in order to maintain proper function of these susceptible resources (e.g., see Grand Junction Field Office, NS0-4, Lentic Riparian Areas- which includes springs, seeps and fens)."<br>• In reviewing numerous oil and gas leasing stipulations contained in other BLM EISs, we have not seen an exception process to allow drilling within water bodies or wetlands. It is our understanding that a "no exceptions approach" within a water body or wetland is BLM's standard procedure. We recommend removing the exceptions clause from the NSO stipulations given the importance of preventing disturbance within water bodies and wetland areas."<br>• We recommend BLM consider revising the 300 foot NSO setback for riparian areas, wetlands, 100 year floodplains of rivers and streams and water bodies and areas within 300 feet of these features to a 500 foot NSO setback for all surface water features. Other BLM Field Offices have required a 500 foot setback to minimize potential deterioration of water quality and to maintain natural hydrologic function of stream channels, stream banks, floodplains, and riparian communities (e.g., see Grand Junction Field Office Draft RMP/EIS, NS0-1, Major River Corridors; NS0-2, Streams/Springs)."<br>• We recommend a 750-foot NSO buffer for water | necessary. |

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| | | | bodies that are impaired. This additional setback will minimize additional degradation of impaired waters in the planning area. | |
| DR-MTDK-SD-13-0007-14 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Potential Measures to Protect Water Resources from Impacts Due to Grazing: Grazing has the potential to adversely impact water resources, including surface and ground waters, wetlands, streams, springs and riparian areas. BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the BLM for Montana and the Dakotas (Rangeland Health Standards) underwent NEPA analysis in 1997 and are incorporated into the relevant RMPs, including the SDFO RMP.<br><br>We recommend that the final RMP/EIS include a list of potential measures that could be implemented at the project level to meet Rangeland Health Standards. This list could include measures that the SDFO has taken in the past, as well as the following suggestions:"<br>• Require special protections for high quality wetland resources such as springs and fens. Such protections might include development of alternative water sources, fencing to exclude livestock from a spring source, and redirection of spring water to a trough for watering;"<br>• To avoid possible contamination of groundwater: through livestock water wells, specify separation buffers between livestock water wells and water troughs or tanks; "<br>• Specify steps to protect and/or repair any existing exclusions and upland water developments, and develop new range improvements to protect water resources;"<br>• Monitor impacts from grazing adjacent to high value water resources;"<br>• Adjust the timing of grazing by delaying Spring turnout, increasing rotation, and focusing grazing on | These actions and measures are addressed in Appendices A and B and in the chapter 2 summary of alternatives. The measures suggested are already incorporated into the existing livestock grazing guidelines. All other comments are items that would be addressed at the project level (implementation level) through Allotment Management Planning or Environmental Review for grazing lease renewals. |

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| | | | areas less intensely used in the previous year; and"<br>• Develop a monitoring plan and schedule to assess effectiveness of range improvements in protecting aquatic resources. | |
| DR-MTDK-SD-13-0007-15 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | In addition, we recommend the Final RMP/EIS identify the general features of an effective adaptive management plan that could be employed at the project level, including the following:<br>• Achievable and measureable objectives;<br>• Specific thresholds that would trigger actions;<br>• Commitment to implement a monitoring plan with protocols to assess whether thresholds are being met; and<br>• Commitment to use monitoring results to modify management actions as necessary | The South Dakota Field Office RMP includes a commitment by the BLM to use monitoring results to modify management strategies. Riparian or wetland monitoring attributes which may trigger changes in management strategies for water resources include but are not limited to steambank stability, trampling, utilization levels, channel characteristics, greenline vegetation, riparian area vegetation composition, and width/depth ratios. Allotment management planning and other project level planning efforts would incorporate riparian evaluation and monitoring. Guidance for implementing site-specific livestock grazing management (i.e., terms and conditions) is discussed under Chapter 2-2, Livestock Grazing, page 124. Any and all potential measures could, and where appropriate or necessary, would be considered at the site-specific level to address any particular and unique resource need or concern. |
| DR-MTDK-SD-13-0007-17 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Public Drinking Water Supply Source Characterization<br><br>In order to ensure that public drinking water supply sources [e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW), and groundwater sources] are protected from potential impacts associated with BLM-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, the EPA recommends that the Final RMP/EIS include a map delineating source water protection areas for public water supply wells. We also recommend identifying reservoirs | The state of South Dakota and some local entities are concerned about the confidentiality of drinking water supply source designations. BLM cannot assure confidentiality. Therefore, we will not include the public drinking water supply sources in our RMP. An NSO for these areas is included in the proposed decision. |

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| | | | that are drinking water sources. | |
| DR-MTDK-SD-13-0007-18 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Public Drinking Water Supply Source Mitigation<br><br>In order to ensure that public drinking water supply sources are protected from potential impacts associated with mineral extraction (including metals, rare earths, uranium, and oil and gas), the EPA recommends that BLM include in each of the alternatives avoidance or mitigation measures related to achieving water quality standards.<br><br>The EPA also recommends the BLM include a commitment in the final EIS and ROD to provide notice to lessees regarding these important areas in the SDFO. For example, lease notices for drilling within Source Water Protection (SWP) Zones of public water supplies are now being used for all wells drilled under BLM authority within SWP Zones in Utah. The notices require the lessee to contact the BLM and the public water system manager to determine any zoning ordinances, best management or pollution prevention measures or physical controls that may be required within the protection zone. | The state of South Dakota and some local entities are concerned about the confidentiality of drinking water supply source designations. BLM cannot assure confidentiality. Therefore, we will not include the public drinking water supply sources in our RMP. Surface occupancy and use is prohibited within State-designated Source Water Protection Areas. (NSO). |
| DR-MTDK-SD-13-0007-19 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | (5) Wetlands, Riparian Areas and springs<br><br>The Draft RMP/EIS indicates that springs and seeps are not common in the planning area and that the few springs and seeps that are present on public land are located in or around the Black Hills, mainly within the Exemption Area. It also indicates that occasionally, a spring or seep can be found near floodplains along drainage ways. Although uncommon in the planning area, springs often contain rare or unique plant and animal species in addition to being important contributors to hydrologic | The planning areas includes the entire state of South Dakota. A map of each springs and seep would be difficult to portray at this scale. Maps of springs are maintained in the range files at the BLM office. In addition information about seeps is dynamic as they tend to dry up during dry periods and remerge years later during wet cycles. BLM documents springs and seeps as they are found during riparian and rangeland health assessments. At the project level BLM identifies and evaluates the impacts of proposed actions on these features. BLM would implement the mitigation |

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| | | | function. Therefore, the EPA recommends that the final RMP/EIS include a commitment for further analysis of springs at the project level, including evaluation of function or condition prior to authorizing any activities in these areas. To ensure that springs, as well as perennial seeps and wetlands, are identified to facilitate their protection, we recommend delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before development. We appreciate that the Draft RMP/EIS describes mitigation measures that the BLM commonly applies when approving APDs for oil and gas construction, drilling and production activities to prevent adverse impacts to these aquatic resources. We encourage the BLM to continue to require best management practices such as silt fences, detention ponds and other stormwater control measures. Other potential mitigation measures, including oil and gas leasing stipulations and measures to protect water resources from grazing impacts, are discussed above under Surface Water Mitigation. **Duplicated in Russ' Water Resources.** | measures as described in the Final RMP. Best Management Practices would be made mandatory as part of the authorization of individual projects. BLM recognizes the unique values of springs and seeps. |
| DR-MTDK-SD-13-0007-20 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Water Management<br><br>Water demand associated with the drilling and completion of oil and gas wells, uranium mining and hard rock mining is an important consideration that will benefit from careful analysis and disclosure. The EPA recommends the Final RMP/EIS analyze the following:<br>• Estimated water demand for the anticipated development in the planning area;<br>• Possible sources of this water; and"• Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow and associated water quality, and impacts on aquatic life, wetlands, and other aquatic resources).In addition, the EPA | BLM projects that 3 to 5 wells per year would be drilled on public lands and minerals in the planning area. The volume of water needed for drilling a well is variable, and the location and time of drilling are based on factors that are outside the ability of the BLM to manage or predict. Technological advances in oil and gas operations are expected to continue surfacing which is likely to decrease the volume of water required to initiate oil and gas production. Contributing to the low level of consumption of water is the fact that fracking of horizontal wells has not been necessary to adequately produce from the formations being drilled in SD. BLM and the State of SD do not expect fracking to occur on a large scale. Sufficient data do not exist at this time to |

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| | | | recommends the Final RMP/EIS analyze and disclose how flowback and produced water from oil and gas activities and how uranium waste f1uids will be managed, including:<br>• Estimated volumes of material;<br>• Disposal options and potential discharge locations for managing the flowback and produced water from oil and gas activities and uranium waste fluids (i.e., UIC wells, evaporation ponds, and surface discharges);<br>• Possible target injection formations, formation characteristics and depth of any UIC wells; and<br>• Potential impacts of managing the flowback and produced water from oil and gas activities and the disposal of uranium waste fluids.<br><br>The EPA recommends BLM encourage operators to consider recycling oil and gas produced water for use in well drilling (after drilling the surface hole) and stimulation, thereby reducing the amount of water withdrawals and number of produced water management/disposal facilities and minimizing the associated impacts. | estimate the volume of produced water generated by oil and gas development within the planning area through the life of the Proposed RMP and Final EIS (i.e., 2035). BLM must comply with the Clean Water Act and the National Environmental Policy Act of 1969 (NEPA), and the analysis of impacts to specific waterbodies from oil, gas, and coal development is outside the scope of the Proposed RMP and Final EIS. The Clean Water Act requires that BLM actions protect beneficial uses of South Dakota's waters. Individual actions would continue to be analyzed through the NEPA process on a case-by-case basis to ensure that they comply with these and all other applicable regulations and policies. The RMP provides general guidance on disposal of waste materials in Appendix E and other places. Sufficient data do not exist at this time to identify specific potential discharge locations with any degree of certainty. Questions of management of waste materials are more appropriately discussed at the project level along with specific proposals, with relation to state and federal regulations (many of which are discussed in the RMP including BLM's own Onshore Orders). UIC programs are run by EPA and the states, so are out of the purview of the BLM. |
| DR-MTDK-SD-13-0007-21 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Water Resource Monitoring<br><br>The EPA recommends that SDFO require all BLM-authorized oil and gas multi-well projects to conduct groundwater and surface water monitoring, similar to RMP requirements included in recent EISs by other BLM Field Offices, e.g., White River and Grand Junction in Colorado. To that end, we recommend that the Final RMP/EIS address how water quality monitoring in the planning area will occur prior to, during, and after such development to detect impacts to | See Appendix E, Oil and Gas Operations, Drilling Permit Process, Permitting, fourth paragraph.<br><br>Adherence to 43 CFR §3160; Onshore Oil and Gas Orders No.1, No. 2, and No. 7; and The Gold Book will serve to protect water quality through practices and programs that include compliance monitoring. |

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| | | | both surface water and groundwater resources, including private well monitoring. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS1. Also, the National Ground Water Association's Water Wells in Proximity to Natural Gas or Oil Development Brief 2 provides information on the importance of baseline sampling for private wells and types of analysis recommended. | |
| DR-MTDK-SD-13-0007-8 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Groundwater Resource Characterization<br><br>The existing and potential future groundwater use in the region make it important to characterize the groundwater resources within the planning area. We recommend expanding the discussion in the Final RMP/EIS, Chapter 3, Affected Environment, to include the following information:<br>• A description (including maps) of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)( I) which supplies any public water system; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (I) currently supplies drinking water for human consumption; or (ii) contains fewer than 10,000 mg/l total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3); Maps depicting the location of sensitive groundwater resources such as: municipal watersheds, source water protection zones, sensitive aquifers and recharge areas. We recommend contacting Tom Brandner, South Dakota Department of Natural Resources (SDDNR), Groundwater Quality Program at (605) 773-3296 and | The Proposed RMP and Final EIS is not intended to be a complete reference guide and is not the appropriate place for a description of each aquifer within the planning area. The discussion of aquifers as described in Chapter 3 water section provides charts and diagrams about water and water flow. The condition of water quality is dynamic and presentation of detailed information about water quality is likely to be out of date soon after it is published. Rather than list the current status of water quality in aquifers in South Dakota (the planning area), we have summarized this information in chapter 3 and referenced the State Water Quality and impaired stream 303 (d) list in the SD Dept. Envir. and Res. water website and referenced the other sites that provide this type of information include the State's water quality website http://denr.sd.gov/des/gw/groundprg.aspx and DENRs water quality monitoring networks website and http://denr.sd.gov/des/sw/wqmonitoring.aspx and the EPAs water quality assessment report for SD at http://iaspub.epa.gov/waters10/attains_index.control?p_area=SD USGS site http://sd.water.usgs.gov/ The state of South Dakota DENR has informed BLM that some local entities are concerned about the confidentiality of drinking water supply source |

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| | | | Derric lies, South Dakota Geological Society at (605) 677-5227 for this information;<br>• A description of any existing information regarding the locations and causes of groundwater contamination; and<br>• Data on the amount of annual use of groundwater in each of the major aquifers. | designations and display of these areas. BLM cannot assure confidentiality. Therefore, we will not include the public drinking water supply sources in our RMP. |
| DR-MTDK-SD-13-0007-9 | US Environmental Protection Agency, Suzanne Bohan | Federal Government | Groundwater Impacts and Mitigation<br><br>The Draft RMP/EIS describes impacts to groundwater resources that may result from RMP activities and it identifies some measures that the BLM might require to reduce these impacts. The EPA appreciates that the SDFO has included mitigation measures that could be required at the project level or the application for permit to drill (APD) stage that would minimize impacts to groundwater resources. Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. The EPA recommends that the following additional mitigation measures be included in the Final RMP/EIS:<br>• Best management practices and other mitigation measures for oil and gas activities such as closed loop drilling, monitoring of water quality and water levels, closure and monitoring of reserve pits, and lining and monitoring of evaporation ponds that will be required;<br>• Setback stipulations, such as No Surface Occupancy (NSO) for oil and gas activities, to minimize the potential for impacts to current and potential drinking water resources, including domestic water wells and public water supply wells. The EPA recommends a minimum 500-foot setback for private wells. Setbacks provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be | See Appendix B. Fluid Minerals BMPs (best management practices), Oil and Gas Appendix E.9. Oil and Gas Supplementary Information, Procedures in Oil and Gas, Appendix E.10. Guidance and Examples for Oil and Gas Conditions of Approval, the Onshore Orders, and the Gold Book. The No Surface Occupancy within 300 feet of floodplains of rivers and streams and water bodies provides a high level of protection by creating a buffer that extends from the boundary of the wetland or riparian area, not just the edge of the stream. Oil and Gas Order Number 1, Approval of Operations allows for the movement of proposed wells by up to 660 feet (200 meters), which is used frequently to protect sensitive resources. Diagrams in the Applications for Permit to Drill, engineering reviews, as well as inspections do what the referenced schematic is intended to present. |

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| | | | secured. We note that the North Dakota Oil and Gas Commission has adopted a 500-foot setback from occupied dwellings (and by default, the associated domestic well);<br>• A mitigation plan for remediating future unanticipated impacts to groundwater from RMP activities, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means; and<br>• A general oil and gas production well schematic that depicts the following: casing strings; cement outside and between the various casing strings; and the relationship of the well casing design to potentially important hydro-geological features such as confining zones and aquifers or aquifer systems that meet the definition of a USOW. We recommend discussing how the generalized design will achieve effective isolation of USDWs from production activities and prevent migration of fluids of poorer quality into zones with better water quality. | |
| DR-MTDK-SD-13-0011-7 | Izaak Walton League of America, Gerald Schlekeway | Environmental Protection Association | The SD IWLA is concerned that inadequate protections for riparian areas, mesic sites, and natural wetlands are inadequate in all of the alternatives presented. Mesic sites and natural wetlands are essential throughout the range of habitats in the sage steppe ecosystem, for brooding sage grouse, sharp-tail grouse, and a broad variety of passerine bird species. Surface disturbances, proximity of oil and gas development, livestock water developments including tanks and pipelines, and placement of salt and mineral supplements in proximity to these sites represent serious threats to the integrity, productivity and sustainability of these highly sensitive areas. | BLM has placed detailed emphasis on protection of habitat for these species as described in the alternatives described in in the wildlife and special status species section of the summary of Alternatives Chapter 2 and Appendix B, Guidelines for Grazing Management, Appendix V-1 Sage grouse mitigation and conservation actions. These alternatives, guidelines and practices provide detailed techniques and actions to best protect habitat and limit disturbance to these species. |
| DR-MTDK-SD-13-0030-10 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The Final RMP/EIS needs to discuss the impacts of each of the alternatives on the soil and watershed conditions within the planning area and to provide appropriate mitigation measures under each alternative. | Mitigation measures were provided appropriate to the land use planning process in various sections of Chapter 2. Impacts are discussed in Soil and Water Sections of Chapter 4 and Table 2.3. |

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| DR-MTDK-SD-13-0030-4 | Western Watersheds Project, Travis Bruner | Environmental Protection Association | The BLM is required to meet the water quality standards of every state in which it administers public lands. Livestock grazing in and near streams results in increased E. coli and fecal coliform bacteria. The Final EIS and RMP must explain how the plan complies with South Dakota surface water quality standards for E. coli and fecal coliform bacteria. | South Dakota's 2010 Clean Water Act (CWA) Section 303(d) Impaired Waters List is what the BLM looks at to determine if any BLM administered lands are within or adjacent to any listed streams and whether or not is a cause by livestock. Changes are made on allotments from a case-by-case basis and with site specific NEPA.BLM coordinates with the state and other agencies to insure water quality standards are met. Grazing use on public lands in SD is generally dispersed over a large area with limited concentration of livestock along streams and rivers. The RMP describes measures and grazing practices designed to mitigate impacts, so that proper functioning condition, and thus water quality standards can be met. |
| DR-MTDK-SD-13-0047-22 | State of South Dakota | State Government | On page 226, the RMP mentions livestock grazing allowed in riparian areas can positively affect water quality. Please explain how such grazing would be implemented under the BLM Rangeland Health Standards. | This reference was describing how improved or well managed grazing practices can improve water quality. Grazing allotments which are meeting the Standards for Rangeland Health are meeting all five standards, including air and water quality, therefore allowing livestock grazing does not change the affects on water quality when assessed. The Allotment Planning process, guidelines for grazing management and the grazing lease renewal process is described in the livestock grazing section of Chapter 3 and in Appendix B. |
| DR-MTDK-SD-13-0047-43 | State of South Dakota | State Government | On page 352, the RMP mentions the BLM operation plan for reservoirs. We suggest that the citation for this plan be included in the RMP. | A search of Chapter 3 has not turned up any reference to "...BLM operation plan for reservoirs...", or permutations thereof. |
| DR-MTDK-SD-13-0048-27 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 533 - We do not agree with the last sentence on pg. 533 that riparian function as evaluated by the BLM's PFC method can be used as an effective indicator of water quality. Ms. Sandy Wyman, a respected expert on riparian systems and a lead range scientist on BLM's National Riparian Team based in Oregon has stated | Page 533 - The intent of using PFC as an early indicator for water quality impacts is to initiate a proactive approach to water quality management. Purely focusing on in-stream parameters would necessitate measurable impacts prior to taking corrective action. This reactive approach would have a much greater likelihood of |

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| | | | many times at meetings that PFC is NOT, repeat NOT, an indication of water quality. PFC observes plant community, channel bank, and certain physical indicators. It observes no chemical or dissolved solids observations and by definition, can not estimate water quality.<br><br>Pg. 535 - Again, please change any reference to managing for PFC on uplands. ( See Glossary and bottom of pg. 537 for RMP language to support this comment. )<br><br>Pg. 538 - Under "Water Rights", the RMP should state that BLM will contact the actual beneficial users of water in South Dakota and allow co-applicant status for water rights as per the State law. | degrading water quality. The combination of using PFC as an early indicator of potential problems along with the States water quality monitoring program form the basis for a holistic water quality program. Applicable references include Aron, J.A., Hall, R.K., Philbin, M.J, and Schafer, R.J. (2013). Using watershed function as the leading indicator for water quality. Water Policy 15, 850–858. Prichard, D., Anderson et al. (1998). Riparian Area Management: A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lotic Areas, Technical Reference 1737–15. US DOI.<br><br>The last sentence on page 533 states; Thus, riparian function can be used as an effective indicator of some aspects of water quality and can provide an early indication of water quality problems. When conducting PFC, the vegetative, hydrology and erosion/deposotional characteristics are taken into account. Therefore if you are seeing declining trends in PFC you may or may not have indication of water quality issues. In the 1997 Record of Decision of the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Montana, North Dakota and South Dakota which is also located in Appendix A states; Dakota Standard #1: Uplands are in proper functioning condition for site specific conditions of climate, soils and parent material. This document is what BLM uses to make allotment determinations after the field assessment occurs for rangeland health.<br><br>Page 535 - While PFC is used to describe the riparian assessment method to evaluate Properly Functioning Condition of riparian systems, the term is also used to describe health conditions in uplands in the 43 CFR |

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| | | | | 4180 regulations that address rangeland health standards. This statement was left as is. Page 538 - BLM would follow state water rights requirements as discussed in the RMP Chapter 2 and Chapter 3. |

**Table W-26**
**Comments Related to Wilderness**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0024-1 | South Dakota Wildlife Federation, Chris Hesla | Wildlife Association | The plan should designate, offer, and insure; a Wilderness review of current lands that remain unaltered by man and available for such a distinction. | Wilderness potential was considered when the RMP was developed. BLM administered lands in SD consist mostly of small parcels of public land that are highly intermingled with private lands. Highways, roads, powerlines, water developments and other types of infrastructure are common on BLM lands throughout the planning area. There are no BLM lands in SD that meet the minimum criteria for wilderness designation. Refer to Chapter 3 Special Designations. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
|---|---|---|---|---|
| DR-MTDK-SD-13-0004-6 | Black Hills Multiple Use Coalition, Tom Troxel | Association | Finally, we are concerned about the proposed direction regarding prairie dog management. Specifically, we are concerned that the RMP sets a limit for treating only 15% of prairie dog acres. From experiences in other areas where prairie dog populations exploded, limiting treatments to no more than 15% of acres will likely not be adequate to manage populations in the event of a dramatic increfase. We request that you establish a maximum or target number of acres of prairie dogs as a guide for management rather than a maximum percentage of acres for treatment. | Considering that prairie dogs occupy only 2% of their historic range and that the 15% treatment is per year, the management action is actually very practical in terms of the amount permissible to treat. Prairie dog populations can by cyclic and they are susceptible to plague. Prairie dogs are also important to their ecosystems and support a variety of species including the endangered black-footed ferret that are in decline in part because of the lack of prairie dogs across the landscape. |
| DR-MTDK-SD-13-0019-2 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please fully discuss all actions that are taken by other agencies or yourselves to "manage" predators on your lands, especially aerial hunting. Please discuss the positive roles of predators in your ecosystems (in addition to any discussion of any negative effect on agriculture). Please discuss all controversial science and theory related to predator control, especially for coyotes. Please provide at least one alternative that maximizes the role of predators on the landscape beyond the status quo. | BLM manages habitat for all wildlife species but does not manage the wildlife populations. BLM does not implement or endorse predator control. Take of predators on public lands must be accomplished legally through the State's licensing process. |
| DR-MTDK-SD-13-0020-10 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please discuss all your "predator control" • programs and how you work with APHIS, private land owners and or the state with predator and varmint control. | BLM does not have "predator control" programs. The state of South Dakota has Animal Damage Control to address issues between citizens and prairie dogs, coyotes, etc. APHIS is called in to deal with problem from predators or pests. BLM coordinates with APHIS on an annual basis but does not provide direction for APHIS in terms of the methods they use. Most contact with APHIS is between ranchers, county and State government. |
| DR-MTDK-SD-13-0020-2 | Prairie Hills Audubon Society, Nancy Hilding | Wildlife Association | Please differentiate between "big game" • animals that are "prey" • species and those that are "predator" • species and discuss them differently in the sections on affected environment , environmental consequences and mitigations. The issues with predators and prey are not | There is discussion present already in the RMP about each of the big game species, including mountain lions. The RMP is probably not the best place to host an in-depth discussion about ecosystem dynamics and interactions, although the BLM recognizes that these |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | always the same.<br><br>Discuss the effects of large predators on ecosystem and particularly any species protected under the Endangered Species Act like grey wolves and candian lynx, or other wise believed to be at risk. What will large predators help by reducing medium and small predators? Will they help riparian areas to recover? Please discuss the effect of predators, large, medium and small on your species targeted for protection | dynamics and interactions are important to the health of entire landscapes. It is beyond the scope of the RMP to discuss the ecosystem effects of endangered predators such as lynx that are not present in the South Dakota planning area. State fish and wildlife agencies are responsible for managing predator and prey populations on public and private lands, and any issues BLM has with maintaining landscape and habitat health that cannot be addressed through use authorizations or other hands-on projects are directed to Game, Fish and Parks. |
| DR-MTDK-SD-13-0025-8 | United States Forest Service, Mary Erickson | Federal Government | What standards will the BLM use to protect bats at energy developments such as wind towers and pits at oil/gas drill sites? | Siting Guidelines for Wind Power Projects in South Dakota are Best Management Practices that were developed by the SD Bat Working Group and SD GFP. These BMPs are included as management direction for the SD RMP/EIS. A summary of these BMPs is included at the end of Appendix B. A full version can be found at http://gfp.sd.gov/wildlife/docs/wind-power-siting-guidelines.pdf. Direction to reduce adverse impacts to wildlife from oil and gas pits can be found in Appendix B "Oil and Gas BMPs for Wildlife" and in sections of Appendix E-9 "Oil and Gas Supplementary Information" and in Appendix E10 "Guidance and Examples for Oil and Gas Conditions of Approval". |
| DR-MTDK-SD-13-0027-16 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Powerline towers are likely to concentrate raptor nesting and perching activities, to the potential detriment of prey species. Transmission towers may be particularly attractive as nest sites for ravens, and Steenhof et al. (1993) reported that 133 pairs of ravens had colonized transmission towers on a single stretch of powerline in Idaho during its first 10 years of existence. Gilmer and Wiehe (1977) found that nest success for ferruginous hawks was slightly lower for transmission towers than other nest sites, and noted that high winds sometimes blew tower nests away. Steenhof et al. (1993) also found | Science is not yet conclusive with regards to sage-grouse and power lines. Recent research is showing that the effects of power lines on sage-grouse may not be as dire as once thought (at least in some places and under some circumstances). The NTT Report does not state a minimum distance at which power lines must be buried near a lek, but instead says that BLM should "take advantage of opportunities..." to bury power lines near leks. Where burying is not a viable option, other measures, such as siting where terrain serves as a visual barrier and installing raptor deterrents on power poles, |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | that transmission tower nests tended to be blown down, but found that nest success was not lower on towers for ferruginous hawks and was significantly higher on towers for golden eagles. In North Dakota, Gilmer and Stewart (1983) found that ferruginous hawk nest success was highest for powerline towers and lowest for nests in hardwood trees. Thus, although powerlines can be designed to reduce impacts to raptors, these corridors should be sited more than 2 miles away from prairie dog colonies and sage grouse leks to prevent major impacts to these sensitive prey species.<br><br>The RMP should include an outright exclusion of all overhead powerlines inside Priority Habitats, as recommended in the National Technical Team report. Wisdom et al. (2011) found that proximity to powerlines and cell phone towers were two of the human-caused variables most strongly correlated with sage grouse extirpation across their range. For powerlines, burial would be required in the DEIS only if it is safe to do so and within 2 miles of sage grouse leks inside and outside of PPA under Alternatives C and D. DEIS at 59. The buffer is even smaller under Alternative B, one mile only. DEIS at 648. BLM claims this one-mile buffer "would minimize effects to sage-grouse and numerous other species such as electrocutions, collisions, predation, and habitat fragmentation." • Id. Not so according to the science, at least for sage grouse. Even the two-mile buffer is inadequate, because 2 miles from a lek is still the heart of nesting habitat, meaning that nesting sage grouse would be immediately and negatively affected by the placement of powerlines this close to the lek. BLM cites a study that points out that grouse in South Dakota spend 62% of their time within 2 miles of leks, making this an important area for grouse. DEIS at 649. True | will used instead. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | enough, but siting powerlines at the edge of this 2-mile buffer still allows impacts from concentration to predation to extend for __ mile toward the lek, degrading sage grouse habitat function. And 38% of grouse's time was spent in sagebrush habitats farther than 2 miles from leks under this study (DEIS at 648), during which time they would be directly impacted by powerlines sited there, and 32% of hens were found to nest farther than 1.86 miles from leks (Kaczor 2008, DEIS at 658), to be directly affected by powerlines sited there.<br><br>Under the Preferred Alternative, Overhead powerlines would be required to be underground within 2 miles of leks, but only "when they can be safely buried." • DEIS at 669. Where this is not the case, they will be allowed with some mitigation measures. Instead, BLM should allow powerlines within 4 miles of sage grouse leks only when they can be safely buried. Where safe burial is not an option, these areas should be treated as an exclusion area for powerlines. The National Technical Team report is unambiguous in its recommendation that powerlines must be buried in Priority Habitats. | |
| DR-MTDK-SD-13-0027-27 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Virtually the entire area managed under the South Dakota RMP is habitat for either the white-tailed or black-tailed prairie dog. Collectively, all species of prairie dogs have been reduced to only 2% of their historical range (Miller et al. 1990). We urge the BLM to manage its lands to foster the full recovery of the black-tailed prairie dog to its native range and natural population levels across the public lands it manages.<br><br>Prairie Dogs are Ecosystem Regulators<br><br>Prairie dogs are fundamental regulators of ecological processes within the area occupied by active colonies. | Prairie dogs will never be restored to their historic distribution because much of the land they once occupied has been developed for agriculture, energy, and ex-urban growth. There is also strong opposition by many to the presence of prairie dogs at their current population and distribution, and widely reintroducing prairie dogs is unrealistic. That said, prairie dogs are very important ecosystem drivers, and there are many prairie species associated with prairie dogs and their colonies. BLM tries to manage both for the continued presence of prairie dogs on public lands while taking into consideration the needs and desires of other stakeholders. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | According to Miller et al. (1990: 765), "Prairie dogs have been implicated as ecosystem regulators that influence primary productivity, species composition, species diversity, soil structure, and soil chemistry by their burrowing and grazing." • Hansen and Gold (1977: 213) concluded, "This study, compared with previous research, provides evidence that blacktail prairie dgs [sic] are an important ecosystem regulator as they disturb the soil, increase plant diversity (Gold 1976), increase animal diversity, and cause a decrease in primary production of the areas they use." • Agnew et al. (1986) labeled prairie dogs as ecosystem regulators, maintaining shortgrass habitats. As regulators of ecosystem processes, prairie dogs are keystone species in shrubsteppe and grassland habitats. | |
| DR-MTDK-SD-13-0027-28 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | It is important to note that no alternative would prohibit prairie dog poisoning on public lands, even though such a management approach would be perfectly reasonable under NEPA's range of alternatives requirements. We call upon BLM to implement such an alternative. We support the reintroduction language in Alternative C | BLM allows only up to 15% of prairie dogs to be treated on BLM lands per year, and the 15% is not an amount actively sought by BLM each year. Allowing a certain maximum percentage of prairie dogs to be treated permits BLM to address other resource and stakeholder concerns on public land that may conflict with the presence of prairie dogs. |
| DR-MTDK-SD-13-0027-30 | WildEarth Guardians, Erik Molvar | Environmental Protection Association | Because it is impractical to move roads away from nest sites when prey bases decline, the appropriate way to ensure the persistence of ferruginous hawks at traditional nesting sites is to use large buffers within which ground-disturbing activities are prohibited. Cerovski et al. (2001) reviewed the issue of appropriate nest buffers and recommended a 1-mile buffer, kept free from human disturbance. Thus, we recommend 1-mile buffers prohibiting surface disturbance for ferruginous hawk nest sites as well as all other raptor nest sites. | BLM must balance the need for the protection of species with multiple use mandates. The buffers utilized by BLM for raptor nests are those recommended by the Montana/Dakotas State Office based on an extensive review of the literature base. While a 1 mile buffer may be ideal, we have chosen the minimum size that would provide adequate protection for these birds while allowing for other land uses. |
| DR-MTDK- | The Wildlife Society, Silka | Wildlife Association | Pg 88MA #14 Limit activities that would destroy or degrade traditional high value roost sites for wild | BLM does not include BMPs for every species of wildlife. Evaluation of wildlife habitat needs for most |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| SD-13-0028-12 | Kempema | | turkeys.MA #15 Retain 10 inch or larger DBH trees in groups of 3 to 6 that have roost tree characteristics on slopes and ridges to provide roost sites for turkeys within ponderosa pine habitat. These two management actions need a range of alternatives to assess the important values to determine whether these actions are the BMP. | species occurs on a project-level basis. |
| DR-MTDK-SD-13-0028-9 | The Wildlife Society, Silka Kempema | Wildlife Association | Coordinate with other federal, state and private land management agencies in developing a habitat management plan. This management action needs to include more than HMP's (add general allotment, coordinated resource or other resource related plans), that these agencies and interest groups are coordinated with for input.<br><br>BLM authorized activities would actively manage for multiple ecosystems and a variety of habitat conditions for non-game mammals, migratory and grassland birds. | These items are addressed in Chapter 1: discussion of coordination with other agencies and stakeholders. Refer to the end of Chapter 1, goals section which address the items from the second comment. |
| DR-MTDK-SD-13-0029-4 | World Wildlife Fund, Martha Kauffman | Wildlife Association | Once South Dakota has completed the identification and adoption of Important Bird Areas (as one of only two states in the U.S. that does not currently have any identified), the BLM should adopt these areas with appropriate management actions (as we previously stated in our scoping comments "“ Attachment A). | Important Bird Areas carry no management teeth in and of themselves. All migratory birds are protected under the Migratory Bird Treaty Act, and having greater knowledge of species present does help inform BLM's management decisions. Furthermore, it is possible that some IBAs may fall within sage-grouse PPAs in which case the protections afforded sage-grouse would also benefit other wildlife. |
| DR-MTDK-SD-13-0045-5 | United States Forest Service, Dennis Aeger | Federal Government | Bat Habitat Management<br><br>We have several comments on Draft RMP/EIS Chapter 3.<br><br>1. Page 463, Public Safety, Abandoned Mine lands: The last line says "Appendix D provides general BLM guidance for mitigation of the hazards associated with these AMLs." We could find no guidance in Appendix D | Additional language has been added to the final RMP/EIS to further clarify management of bats and their habitat. Reclamation Appendix D applies only to reclamation of surface disturbance. There are no BMPs for adits and shafts, except in the form of ensuring public safety through installation of bat gates (Chapter 2, Table 2-2 pg. 175, Chapter 3, pg. 464, also Chapter 4, pg. 838). These are evaluated on a case-by-case basis. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | regarding how to deal with open shafts or admits that provide bat habitat. The DEIS states on page 464 that bats will be considered when reducing risks to human health and that bat wildlife habitat associated with AMLs will be protected to the extent possible. Below are some suggestions for specific standards that could be incorporated into the Final EIS and RMP to conserve bat habitat:<br>a. Evaluate adits and shafts for bat habitat prior to closing.<br>b. If adits and shafts are to be closed for public safety, use a structure that allows for bat passage if possible.<br>c. If a bat-friendly gate is not possible, exclude bats from shafts and adits prior to closing. | |
| DR-MTDK-SD-13-0045-6 | United States Forest Service, Dennis Aeger | Federal Government | Page 775, Wildlife, Including Special Status Species, and Aquatic and Fisheries Resources. Consider deleting the last sentence (these measures would add to costs). While this is likely the case, you have already stated that your 'goals' include ensuring that native wildlife habitat is conserved. We suggest these 'costs' should be planned for, and anticipated instead of implying a financial burden if you provide for wildlife and aquatic resources. | Suggested edits were made. |
| DR-MTDK-SD-13-0045-7 | United States Forest Service, Dennis Aeger | Federal Government | BLM buildings/structures-<br><br>3. If there are old buildings on BLM lands, consider the needs of bats that may be currently roosting in attics. And, if maintenance or repairs are needed consider conducting these activities during the non-breeding season (so not to disturb bat maternity roosts) - in the fall/winter if possible. | This would be addressed at the project level and is included in the BMPs in Appendix B. There are not many historic structures on BLM land in South Dakota that would serve as bat roosts. |
| DR-MTDK-SD-13-0047-30 | State of South Dakota | State Government | On page 349, third paragraph under "Colonial Water birds" mentions that "the wetland water-associated habitats on which they depend are maintained through wetland-specific management." We request that the | This statement means that actions to protect wetlands maintains habitat for these types of birds. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| | | | BLM provide a plan citation for this management. | |
| DR-MTDK-SD-13-0047-37 | State of South Dakota | State Government | On page 363, we suggest that the BLM identify sagebrush obligate species in Table 3-16. | Several sagebrush obligate species, besides sage-grouse, are listed in Table 3-16. These include Brewer's sparrow, sage sparrow, and sage thrasher. Not listed are pronghorn antelope and several other small mammals, including the sagebrush vole. Regardless of which species are listed sensitive in the RMP, the new sensitive species list updated and distributed periodically by the BLM Montana/Dakotas State Office will supersede the old. |
| DR-MTDK-SD-13-0047-39 | State of South Dakota | State Government | On page 366, regarding burrowing owls, we recommend citing THIELE, JASON (2012). Burrowing owl distribution and nest site selection in Western South Dakota. M.S. thesis. South Dakota State University, Brookings, South Dakota. 128 pages.<br><br>On page 367, the RMP references the distribution of the Blue Sucker, Finescale Dace, Finescale Dace hybrid (Phoxinus eos x P. neogaeus), Sicklefin Chub, and Chrosomus eos x C. neogaeus. We recommend that the RMP include the citation for this source.<br><br>On page 367, the RMP references current and historic ranges of fish in the Missouri River and its tributaries. We request that the RMP define the BLM defines as historic.<br><br>On page 370, the RMP talks about reservoirs having the capabilities of supporting fish. Does this include stock dams?<br><br>On page 372, the RMP references 34 species of native and 12 species of introduced fish. We recommend the citation be provided. | Jason Thiele's thesis will be included in sources and cited in text.<br><br>A source was included for the rare fishes.<br><br>The BLM did not define 'historic' ranges for species in this case. Information on fishes and their distributions, historic and current, were obtained from sources by South Dakota Game, Fish, & Parks. These sources are cited both in text and in the bibliography.<br><br>Stock dams may provide habitat components suitable for fish, but these typically only contain fish where fish have been intentionally stocked. BLM does not stock fish in stock dams unless such action is the purpose of the project.<br><br>A citation has been included regarding the numbers of native and non-native fish species. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0047-47 | State of South Dakota | State Government | On page 597, the RMP mentions the importance of abandoned mines for bats. Does the BLM have a plan to approach abandoned mines? | Abandoned mine openings are evaluated for bat habitat, public safety hazards, and cultural resources upon discovery. BLM policy is followed to find the best balanced solution to meet the needs of these programs. A solution could range from installing a steel gate, closing a mine opening, or leaving it as it is. |
| DR-MTDK-SD-13-0047-48 | State of South Dakota | State Government | On page 669, in the gray box, we suggest adding "If whooping cranes are observed, staff from SDGFPPierre and USFWS-Pierre should be notified." | This section was modified as suggested. |
| DR-MTDK-SD-13-0048-17 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 102- In mgmt 33, please justify why prairie dog colonies entirely on BLM lands would be managed only for wildlife/recreational values? Does this convey that livestock grazing on such lands would be withdrawn from the multiple use of those lands?<br><br>Pg. 103 - In mgmt 35, please add to your intent to consider reintroduction of prairie dogs to ANY BLM lands, "Only after a written agreement of support from owners of private or State lands affected by this action has been obtained by the BLM".<br><br>In mgmt 36, please propose to allow an increase the acres of percent prairie dog acres to be treated to a level agreed to by ALL ownerships in the grazing allotment. | Management action 33 on page 102 states that prairie dog colonies that "occur entirely on public land would be managed for their wildlife, recreational and *other values*" (emphasis added). Recreation use and other values - which includes grazing - are multiple uses. Management action 35 of page 103 states that "Prairie dogs could be considered for reintroduction on historic colonies or large unfragmented blocks of public and *cooperating adjoining land owners* with a minimum of 10,000 or more acres of public land, if acquired, *with a 1 mile buffer from adjoining private land*, and while *considering other resources and uses*" (emphasis added). BLM manages wildlife habitat (including prairie dogs) as one of many important resources and uses of public land. Evaluating requests for control of prairie dog on a case-by-case basis based on the criteria described in the RMP is reasonable, considering that prairie dogs are a native species that have already undergone a 98% decline across their entire range. Proposing actions on all ownerships of lands is beyond the scope of the RMP. |

**Table W-27**
**Comments Related to Wildlife (General)**

| *Comment Number* | *Organization* | *Commenter Type* | *Comment Text* | *Response* |
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| DR-MTDK-SD-13-0048-19 | Butte County Commissioners, Kim W Kling | Local Government | Pg. 194- We disagree with the statement in alternative "D" that reintroduction of prairie dogs would have "moderate" impacts to vegetative communities. We've seen no literature to support this statement. The impact is severe. | The impacts of prairie dog reintroduction are explained in terms of their effect on vegetation communities. Impacts vary by site with severe impacts in some areas and lower impacts in other areas. |

| **Table W-28<br>Summary of Additional Literature Sources Cited to Support Comments or Requested to be Considered for the SD RMP. Refer to Tables W-1 through W-27 for Comments.** | |
|---|---|
| DR MTDK-SD-13-01-0011-10 Izaak Walton League of America, Gerald Schlekeway | Berman, Gillian M. 2007. Nesting success of grassland birds in fragmented and unfragmented landscapes of north central South Dakota. M.S. 2858.<br><br>DeJong, Julie R. 2001. Landscape fragmentation and grassland patch size effects on non-game grassland birds in xeric mixed-grass prairies of western South Dakota. M.S. 2758.<br><br>Fritz, Kristin A. 2011. Habitat resource selection by greater sage grouse within oil and gas development areas in North Dakota and Montana. M.S. 2908<br><br>Herman-Brunson, Katie M. 2007. Nesting and brood-rearing habitat selection of greater sage-grouse and associated survival of hens and broods at the edge of their historic distribution. M.S. 2853<br><br>Kaczor, Nicholas A. 2008. Nesting and brood-rearing success and resource selection of greater sage grouse in northwestern South Dakota. M.S. 2863<br><br>Kelsey, Kyle W. 2001. Avian community structure associated with woodland habitats in fragmented and unfragmented landscapes in western South Dakota. M.S. 2767<br><br>Leddy, Krecia L. 1996. Effects of wind turbines on nongame birds in Conservation Reserve Program grasslands in southwestern Minnesota. M.S. 2695.<br><br>Lewis, Amy R. 2004. Sagebrush steppe habitats and their associated bird species in South Dakota, North Dakota, and Wyoming: life on the edge of the sagebrush ecosystem. Ph.D. 2803<br><br>Mattise, Samuel N. 1978. Effects of grazing systems on sharp-tailed grouse habitat. M.S. 2514<br><br>May, Shawn M. 2001. Landscape characteristics affecting habitat use and productivity of avifauna on stock ponds in western South Dakota. M.S. 2760.<br><br>Mosby, Cory E. 2011. Habitat selection and population ecology of bobcats (Lynx rufus) in South Dakota, USA. M.S. 2901.<br><br>Murray, Joanna O. 2005. The influence of grazing treatments on density of nesting burrowing owls on the Cheyenne River Sioux Reservation. M.S. 2823. Orth, Mandy R. 2012. Distribution and landscape attributes of greater prairie-chickens and sharp-tailed grouse outside of their traditional range in South Dakota. M.S. 2925<br><br>Rieger, Bryan A. 2004. Demographics of western South Dakota wetlands and basins. M.S. 2804<br><br>Rigge, Matthew B. 2011. Phenologic assessment of western South Dakota rangelands. M.S. 2928<br><br>Salo, Eric D. 2003. Effects of grazing intensity and temporal application of grazing treatments on nongame birds in North Dakota mixed-grass prairie. M.S. 2792.<br><br>Schaid, Tim A. 1979. Non-game bird habitat associated with haul roads and surface mining for bentonite clay. M.S. 2545.<br><br>Smith, Joe T. 2003. Greater sage grouse on the edge of their range: leks and surrounding landscapes in the Dakotas. M.S. 2790. (Writers note- some data in this research is based on anecdotal evidence and unsubstantiated investigation of lek locations, sage grouse demographics and distribution. The data is heavily influenced by "landowner lockout" • policies that prohibited public access to private and some public lands in North Western South Dakota. The research, therefore, is of questionable reliability.)<br><br>Smith, Vickie J. 2001. Mammal distributions and habitat models for South Dakota. M.S. 278<br><br>Swanson, Christopher C. 2009. Ecology of greater sage-grouse in the Dakotas. Ph.D. 2876.<br><br>Thiele, Jason. 2012. Burrowing owl distribution and nest site selection in western South Dakota. M.S. 2922 |

| Table W-28<br>Summary of Additional Literature Sources Cited to Support Comments or Requested to be Considered for the SD RMP. Refer to Tables W-1 through W-27 for Comments. | |
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| | Williamson, Ryan M. 2009. Impacts of oil and gas development on sharp-tailed grouse on the Little Missouri National Grasslands, North Dakota. M.S. 2873 |
| DR-MTDK-SD-13-0006-6 Defenders of Wildlife, Mark Salvo | Beschta, R. L., D. L. Donahue, D. A. DellaSala, J. J. Rhodes, J. R. Karr, M. H. O'Brien, T. L. Fleischner, C. Deacon-Williams, Cindy. 2012. Adapting to climate change on western public lands: addressing the ecological effects of domestic, wild, and feral ungulates. Environmental Management, available at http://fes.forestry.oregonstate.edu/sites/fes.forestry.oregonstate.edu/files/PDFs/Beschta/Beschta_2012EnvMan.pdf.?Domestic livestock and other ungulates alter vegetation, soils, hydrology, and wildlife species composition and abundances that exacerbate the effects of climate change on western landscapes. Removing or reducing livestock grazing across large areas of public land would alleviate a widely recognized and long-term stressor and make ecosystems less susceptible to the effects of climate change.<br><br>Knick, S. T., S. E. Hanser, K. L. Preston. 2013. Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A. Ecology and Evolution, available at http://onlinelibrary.wiley.com/doi/10.1002/ece3.557/pdf.<br><br>Sage-grouse require sagebrush-dominated landscapes containing minimal levels of anthropogenic disturbance. Ninety-nine percent of remaining active sage-grouse leks were in landscapes with less than 3 percent disturbance within 5 km of the lek, and 79 percent of the area within 5 km was in sagebrush cover.<br><br>Patricelli, G. L., J. L. Blickley, S. L. Hooper. 2012. The impacts of noise on greater sage-grouse: a discussion of current management strategies in Wyoming with recommendations for further research and interim protections. Unpublished report. Prepared for the Bureau of Land Management, Lander Field Office and Wyoming State Office, Cheyenne and Wyoming Game and Fish Department; available at http://www.wy.blm.gov/jio-papo/papo/wildlife/reports/sagegrouse/2012sgNoiseMon.pdf.<br><br>Maximum noise levels from land use and development allowed under the Wyoming state sage-grouse core area policy near sage-grouse leks and other habitat are untested, may be difficult to measure, and may be too high to support sage-grouse conservation within and outside core areas<br><br>Reisner, M. D., J. B. Grace, D. A. Pyke, P. S. Doescher. 2013. Conditions favouring Bromus tectorum dominance of endangered sagebrush steppe ecosystems. Journal of Applied Ecology, available at http://onlinelibrary.wiley.com/doi/10.1111/1365-2664.12097/pdf.?Cattle grazing exacerbates cheatgrass (Bromus tectorum) dominance in sagebrush steppe by decreasing bunchgrass abundance, shifting and limiting bunchgrass composition, increasing gaps between perennial plants, and trampling biological soil crusts. Grazing was also not found to reduce cheat grass cover, even at the highest grazing intensities.5. Copeland, H. E., A. Pocewicz, D. E. Naugle, T. Griffiths, D. Keinath, J. Evans, J. Platt. 2013. Measuring the effectiveness of conservation: a novel framework to quantify the benefits of sage grouse conservation policy and easements in Wyoming. PLoS ONE 8(6): e67261. doi:10.1371/journal.pone.0067261. Available at www.plosone.org/article/fetchObject.action?uri=info%3Adoi%2F10.1371%2Fjournal.pone.0067261&representation=PDF.<br><br>Modeling indicates that the Wyoming sage-grouse core area conservation strategy, fully applied, plus $250 million invested in targeted conservation easements, would slow, but not stop projected sage-grouse population declines in the state. The Wyoming core area policy prohibits or restricts surface occupancy within 0.6 miles of sage-grouse leks, generally limits development to one site per 640 acres, and limits cumulative surface disturbance to 5 percent per 640 acres in core habitat.6. Taylor, R. L., J. D. Tack, D. E. Naugle, L. S. Mills. 2013. Combined effects of energy development and disease on greater sage-grouse. PLoS ONE 8(8): e71256. |

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| | doi:10.1371/journal.pone.0071256. Available at http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0071256.<br><br>The predicted cumulative impact of dense fluid minerals development (3.1 wells/km2 ) and West Nile virus outbreaks on greater sage-grouse quadrupled inactivity at leks in northeast Wyoming compared to the individual impacts of development or disease. Noting the deleterious effects of cumulative impacts on sage-grouse, the researchers concluded that "conservation measures should maintain sagebrush landscapes large and intact enough so that leks are not chronically reduced in size due to energy development, and therefore vulnerable to becoming inactive due to additional stressors." They also advised "placing new developments outside of core [habitat] areas has the greatest likelihood of sustaining [sage grouse] populations."<br><br>Blickley, J.L., K. R. Word, A. H. Krakauer, J. L. Phillips, S. N. Sells, C. C. Taff, J. C. Wingfield, G. L. Patricelli. 2012. Experimental chronic noise is related to elevated fecal corticosteroid metabolites in lekking male greater sage-grouse (Centrocercus urophasianus). PLoS ONE 7(11): e50462. doi:10.1371/journal.pone.0050462.<br><br>Anthropogenic noise from energy development and roads can cause greater sage-grouse to avoid otherwise suitable habitat and increase stress responses in birds that do remain, which could affect disease resistance, survival and reproductive success. The effects of noise from many common activities in the sagebrush biome significantly expands the human footprint on the landscape and impacts on sage-grouse.<br><br>Manier, D. J., D. J. A. Wood, Z. H. Bowen, R. M. Donovan, M. J. Holloran, L. M. Juliusson, K. S. Mayne, S. J. Oyler-McCance, F. R. Quamen, D. J. Saher, A. J. Titolo. 2013. Summary of science, activities, programs, and policies that influence the rangewide conservation of greater sage-grouse (Centrocercus urophasianus). U.S. Geological Survey, Open-File Report 2013"“1098; available at http://pubs.usgs.gov/of/2013/1098/. |
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