THE WILDLIFE SOCIETY
South Dakota Chapter
1112 Westwood Drive
Pierre, SD 57501

11 September 2013

Resource Management Plan Manager Mitch Iverson
Bureau of Land Management South Dakota Field Office
310 Roundup Street
Belle Fourche, SD 57717

RE: South Dakota Draft Resource Management Plan and Environmental Impact Statement comment letter.

Dear Mr Iverson:

The South Dakota Chapter of The Wildlife Society (SDTWS) submits comments on the BLM's proposed SD Draft Resource Management Plan (DRMP) and EIS. Our organization has an interest in this project and we appreciate the opportunity to comment. The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. The South Dakota Chapter achieves this mission in part by evaluating the principles involved in proposed public actions that affect wildlife and habitats. Our Chapter goals and objectives are more clearly outlined at: http://sdwildlife.org/

Our comment letter is formatted as follows:
- Introduction
- National Environmental Policy Act (NEPA) considerations
- Conclusion and Actions we request BLM to consider or take
- Specific comments

Introduction

Numerous wildlife and resource professionals within the SDTWS reviewed the DRMP/EIS. Combined, we have decades of experience in public land issues unique to SD: sensitive species concerns, habitat needs, mining and oil exploration, livestock grazing, recreation, and NEPA. While we greatly appreciate the amount of time that BLM staff gave towards the RMP revision, review of the DRMP/EIS indicated that the DRMP/EIS is lengthy yet without necessary local or relevant scientific support. We hope our comments will aid in strengthening those areas of concern. Several NEPA requirements are missing and must be

incorporated in order to meet Federal law. A 90-day comment period is inadequate for the public to wade through the volume of information and to sort out what is relevant and that which is missing.

NEPA Issues

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

40 CFR 1502.14: Alternatives Including the Proposed Action

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.

40 CFR 1502.16: Environmental Consequences

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.

40 CFR 1502.22: Incomplete or Unavailable Information

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 impacts." For example, see our comments for Greater Sage-Grouse PPAs in MA #20 Alt B and Preferred Alt.

40 CFR 1502.24: Methodology and Scientific Accuracy

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.

Conclusion and Actions We Request BLM to Consider or Take

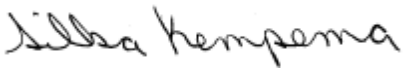
We believe that BLM's goal is to follow its federal directives to reach a final revised RMP and ROD that are environmentally responsible, will serve the public and its needs and will adequately lead the agency to project-level actions for the next 20+ years. Those of us that are involved in the SD Chapter of TWS know all too well how difficult and challenging it is

to plan projects and follow agency directives with changes outside our control (climate, policy changes from Washington, laws, etc.). What can be controlled is an exceptionally written, scientifically supported RMP.

As resource peers to the SD BLM Field Office staff, we sincerely believe that this draft will not serve you, the public or public trust resources into the future. As currently written, the DRMP/EIS is inadequate as pointed out throughout our attached comments. 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 public must have an opportunity to review subsequent changes and improvements to a second draft.

Please continue to send correspondence to our Chapter. If you have any questions regarding our comments, let us know. Feel free to contact our Public Lands Committee Chairman at downtoearth15@rap.midco.net; 4012 Oiler Lane, Rapid City, SD 57701; 605-939-8156.

Sincerely,



Silka L. F. Kempema, President
South Dakota Chapter of The Wildlife Society
1112 Westwood Drive
Pierre, SD 57501

Note: SD Chapter of TWS comments, responses or requests for action are in red font.

Chapter 2
Table 2–1, Summary of Restrictions
O&G stipulation on or near sharp-tailed grouse/greater prairie-chicken leks and brood rearing/nesting habitat
Pg 55
TL: 3/1-6/30 2 miles from sharp-tailed grouse/greater prairie-chicken leks
Surface: 1,316 acres
Subsurface: 15,373 acres

NSO: ¼ mile from sharp-tailed grouse/greater prairie-chicken leks
Surface: 0 acres
Subsurface: 163 acres
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.

Table 2–1, Summary of Restrictions
O&G stipulation on Greater Sage-Grouse PPAs
Pg 57
Alt B & Preferred
NSO
Surface: 83,744 acres
Subsurface: **253,357 acres**

ROWs restriction on Greater Sage-Grouse PPAs
Preferred
ROWs exclusion for Renewable Energy ROWs
Surface: **84,384 acres**
Avoidance for other types of ROWs
Surface: **84,384 acres**
Why are these surface acre numbers different? All surface and subsurface acres in PPA's need to be protected. **Acreage difference 640!**

O&G stipulation on Greater Sage-Grouse PPAs
Alt C
Closed to O&G leasing
Surface: 93,266 acres
Subsurface: 289,563 acres

ROWs restriction on Greater Sage-Grouse PPAs
ROWs exclusion
Surface: 96,379 acres

Why are these surface acre numbers different? All surface and subsurface acres within PPA's need to be protected. Acreage difference **3113**

These numbers for surface acres for PPA's do not match throughout the document
Alt B
Surface: 83,744 acres
Subsurface: 253,357 acres
Or
Surface: 84,384 acres
Subsurface: 253,357 acres
And
Alt C
Surface: 93,266 acres
Subsurface: 289,563 acres
Or
Surface: 96,379 acres
Subsurface: 289,563 acres

Table 2-2, Summary Comparison of Alternatives
Vegetative Communities
Management Common to All
Pg 76
Allocation of forage would be based on benefits to livestock grazing, wildlife, watershed protection, and ecological processes.
This needs to be changed to the following:

Allocation of forage would be based on benefits of livestock grazing and for wildlife, watershed protection, and ecological processes.
Forage allocation should be consistent with management goals and dependent upon vegetative response to seasonal moisture regimes.

Where riparian and wetland areas are already meeting standards they would be maintained in that condition or better. Where a sites capability is less than PFC BLM would manage to achieve or move towards capability.
Agree

Maintain and/or improve desired mix of seral stages within vegetation communities including forest and woodlands, grasslands, shrublands and riparian/wetlands.
Agree

BLM would consider the potential impacts of climate change on disturbed or degraded areas when determining the type of reclamation or the seed mix needed for reclamation.
Agree

Noxious Weeds and Other Invasive Non-Native Species (Plant and Animal)

INVASIVE PLANTS
Alternatives
Pg 80
MA #1 Alt B and Preferred
Spot treatments only, using IPM methods within suitable nesting or brood rearing habitat, within a 3 mile buffer zone, of known sage-grouse leks from March 1-June 30.

Treatments should be utilized to increase native vegetation and to enhance nesting cover conditions. This does not state what sage-grouse habitat area (all or general or PPA's) the spot treatments only would occur.

Pg 80
MA #2 Alt B, C, and Preferred
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.
This alternative contradicts Alternative #1, Invasive Plants section, because this is stating there would be spot treatments in PPA's only.

WILDLIFE
Management Common to All
Pg. 83
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.

BLM authorized activities would actively manage for multiple ecosystems and a variety of habitat conditions for non-game mammals, migratory and grassland birds.
SDTWS requests that game animals, furbearing animals, upland game birds, etc. be included here or specifically all wildlife species?

Alternatives
Planning Area
Pg 85
MA #3
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.
SDTWS disagrees with this alternative. 0.25 miles is a very short distance from leks to be placing wind towers. 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. Johnson and Holloran (2010) noted that five Sharp-tailed Grouse have been recorded colliding with wind turbines.**

Because of sensitivity of prairie grouse to anthropogenic *Appendix A.1 Washington Connected Landscape Project: Analysis of the Columbia Plateau Ecoregion A.1-6* disturbance, in a briefing paper for the USFWS Manville (2004) recommended avoiding placing wind turbines within 8 km of known leks.

Literature Cited:

http://www.fws.gov/southwest/es/oklahoma/documents/te_species/wind%20power/prairie%20grouse%20lek%205%20mile%20public.pdf
http://www.columbia-institute.org/pdf/Okanogan_STG_Report_3-7-10.pdf
http://www.fs.fed.us/pnw/pubs/pnw_gtr863.pdf

Pg 87
MA #11 Public lands within ¼ mile of raptor nests raptor nest (duplication here) sites not defined as sensitive and special status that were active within the last 7 years would be an exclusion area for commercial renewable energy development and an avoidance area for other types of ROWs. Refer to management action 7 in the special status species section of this table for actions associated with special status raptors.

Pg 88
MA #14 Limit activities that would destroy or degrade traditional high value roost sites for wild 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.

Special Status Species
Management Common to All
Pg 91
Inventory potential habitat used by BLM sensitive species.
SDTWS Agrees. This alternative is very critical and a major missing link in South Dakota to proper management of all wildlife species not just SSS species. This needs to be a first priority in the Wildlife Section and the SSS section. Utilize GIS and work with GFP to identify areas and not duplicate efforts.

Manage water developments to reduce the spread of West Nile virus within Greater Sage-Grouse habitat areas (especially for those water impoundments where water levels are artificially maintained).

Manage water developments to reduce the spread of West Nile virus within Greater Sage-Grouse habitat areas.
SDTWS disagrees with this alternative. Are these not the same, one should be eliminated?

Alternatives
Planning Area

Raptors
Pg 92
MA #1 Alt C & Preferred
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.
SDTWS disagrees with this alternative. The Protection of all eagles needs to be the same. 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 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.
Literature Cited
http://www.fws.gov/wyominges/pages/species/Species_SpeciesConcern/BaldEagle.html

MA #2 Preferred
Public lands within ½ mile of bald eagle nests would be an exclusion area for commercial renewable energy development and an avoidance area for other ROWs.
SDTWS disagrees with this alternative. 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!
Literature Cited
http://www.fws.gov/migratorybirds/mbpermits/regulations/BGEPA.PDF

MA #7 Preferred
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 hawk, northern goshawk, Swainson's hawk, golden eagle, and burrowing owls (peregrine falcons and bald eagles nests addressed in management actions 2 and 5).
Move golden eagles to bald eagle alternatives; not adequate protection as stated above. The protection of these raptor species needs to be done by "species" and need; and not by groups (BLM Sensitive Species) for simplification or convenience.

Greater Sage-Grouse General Habitat
Pg 95
MA #11 Preferred
Controlled surface use: Surface-disturbing or disruptive activities within sage-grouse winter range between December 1 and March 31 would require a plan approved by BLM to maintain suitability of habit (change to habitat) and avoid or minimize habitat loss and disturbance. See sagebrush cover Map 2-6.
SDTWS disagrees with this alternative because before the required plan there needs to be an on the ground inventory completed to determine grouse use and activity in the area. This will

determine how BLM will minimize the disturbance and habitat loss. The research completed by C. Swanson showed that these birds move very little in the winter.

Greater Sage-Grouse Protection Priority Areas (PPAs)
Pg 97
MA #19 Alt B and Preferred
PPAs would include 83,744 surface and 253,357 subsurface oil and gas minerals acres. See Map 2-4.
This number has been discussed in previous comments and is not the same as found in Chapter 4 Pg 646 which states 84,384 and in Table 2-1 which has both figures. All surface and subsurface acres in PPA's need to be protected!

MA #19 Alt C
Larger acres protected through Greater Sage-Grouse PPAs including 93,266 surface and 289,563 subsurface oil and gas minerals acres. See Map 2-5. Greater Sage-Grouse PPAs would be designated as an ACEC.
Again this number has been discussed in previous comments and is not the same as found in Chapter 4 Pg. 646 which states 96,378 and in Table 2-1 which has both figures. All surface and subsurface acres in PPA's need to be protected!

MA #20 Alt B and Preferred
Greater Sage-Grouse PPAs would be managed as No Surface Occupancy and Use (83,744 (Acreage difference in Chapter 4 and Table 2-1, see above) surface and 253,357 oil and gas subsurface minerals acres as shown in Map 2-4). These 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.
SDTWS disagrees with this preferred alternative. The development of the greater sage-grouse preliminary PPAs was a science-based process which used multiple data types collected during multiple years. The collaboration between BLM and the SD GFP during the development of the PPAs resulted in the identification of important sage-grouse landscapes within SD. For these reasons, SDTWS questions why only a portion of the identified preliminary PPAs were included in the preferred alternative. The 2008 MOU between BLM and WAFWA members and others stressed the importance of collaboration and science-based decisions for sage-grouse conservation. To exclude a PPA from the preferred alternative suggests that the BLM acknowledges important sage-grouse habitat exists, but chooses not to provide increased protection for their conservation. Considering inadequate regulatory mechanisms were identified as a listing factor for the warranted but precluded listing decision by the USFWS, SDTWS strongly encourages the BLM to include the full preliminary PPA as considered in alternative C in the preferred alternative.

Literature Cited
http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/fish__wildlife_and/fwp.Par.95958.File.dat/SagegrouseMOU.pdf

MA #20 Alt C
Greater Sage-Grouse PPAs would be closed to oil and gas development, recommended for withdrawal from locatable mineral development and closed to salable and other leasable minerals. PPAs/ACEC would include 93,266 (Acreage difference in Chapter 4 and Table 2-1, as stated above) surface acres and 289,563 oil and gas subsurface mineral acres (refer to Map 2-5). All sage-grouse habitat that is not part of a PPA would be managed as General Habitat as noted in Map 2-5.

All the proposed acreage for greater sage grouse PPA's which is 93,266 (correct number) which is surface acres, and 289,563 oil and gas subsurface mineral acres needs to be protected as PPA's because there are the same issues and even greater importance with more private property and connectivity to and from Wyoming and Montana populations.

Pg 98
MA #21, Alternatives B, C, Preferred
All grazing allotments wholly located in Greater Sage-Grouse PPAs would be considered for retirement where the base property owner relinquishes their preference.
SDTWS disagrees with the alternative that considers retiring grazing allotments. There is no discussion of the Chapter 4 impacts of retiring grazing leases in Greater Sage-Grouse PPA's to sage-grouse and/or sagebrush. If grazing is retired, BLM has eliminated one of the best ways to manage sagebrush on the Northern Great Plains landscape. This area is grassland with a shrub component not vice versa. Complete retirement of grazing is a very poor management strategy for eastern fringe sage/steppe habitats. On page 629 it is stated "It is assumed that overall, vegetative treatments would have long-term benefits to special status species." Managed grazing is what sustains diverse grass, forb and sage communities in northwestern South Dakota. Why were alternative management actions not considered or analyzed? Chapter 4, page 595 recognizes the long term benefit of grazing for wildlife. There is no justification in this RMP for complete grazing retirement and the environmental consequences of grazing retirement were not adequately analyzed. There are locations in the PPA's that grazing has been very minimal or eliminated and sagebrush has become decadent and grasses have taken over.
This alternative does not meet the portion of Appendix V Mitigation Measures and Conservation Actions for Greater Sage-Grouse Habitat which is to develop and implement grazing management practices that influence sagebrush growth or the Management Common to All. In addition and as stated in Appendix A, riparian and wetland communities, habitat, and associated uplands would be treated and restored through implementation of livestock grazing guidelines to meet Dakotas Standards for Rangeland Health

Pg. 98
MA #22 Alt B & Preferred
Greater Sage-Grouse PPAs would include the same areas and management of other resource uses as described in Alternative B. Confusing. What is the difference between alternative B and D? If there is no difference they should be stated the same.

Pg. 100
MA #25 Alt B, C & Preferred

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.
SDTWS disagrees. Perpetual conservation easement protecting habitat needs to be mandatory with any lands disposal within PPAs and not looked at as only a final preservation measure. There are NGOs in South Dakota such as The Nature Conservancy that are actively engaged in securing perpetual easements to protect and restore this eco region.

Fire Management
Management Common to All
Planning Area
Pg 113
In Greater Sage-Grouse Protection Priority Areas (PPAs) and within 3 miles of leks in general habitat, use of aggressive suppression techniques and heavy equipment would only be used when lesser techniques would not adequately protect habitat.
SDTWS agrees. These sagebrush areas are relatively small and fragmented and could be totally destroyed by fire without aggressive suppression techniques. Preventative actions should be implemented where possible.

Livestock Grazing
Pg 119
Objective 1: For allotments without approved specific management objectives and established grazing strategies, the utilization level as measured at the end of the grazing season would not exceed 50% on herbaceous forage plants on a pasture-wide basis or on selected key areas. Utilization would be monitored (within staffing capabilities and budget) to gauge effectiveness of management. Allotments with approved management plans would establish allowable use levels for grazing allotments through specific management objectives during the management planning process.
SDTWS feels the objective is too vague and potentially misleading to readers and users. This objective needs to state how you will determine the "not to exceed 50%" (weight, ocular, etc.?) on herbaceous forage plants. Define "pasture-wide basis" or "on selected key areas" so that readers that use in specific areas can far exceed the 50% levels. BLM also states "Utilization 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 objective!

Objective 2: Across the planning area, BLM would allow approximately 50% of the annual vegetation production to be used by livestock with approximately 25% ingested by livestock and the other 25% trampled or soiled. Fifty percent of the annual vegetation production would remain to meet wildlife forage/cover requirements and watershed needs (soil and hydrologic conditions). The additional 25% of the annual vegetation production that would not be consumed by livestock would meet wildlife forage/cover requirements and watershed needs as well. See the

Animal Unit Month Allocations portion of the Livestock Grazing section of Chapter 3 for detailed example of livestock forage allocations.
SDTWS disagrees that the 25% that is trampled or soiled by livestock is available to wildlife. How does this meet wildlife forage or cover requirements? In addition, a 50% utilization rate by livestock on a consistent basis has been shown to exceed recommended grazing rates on semi-arid, Northern Great Plains mixed-grass prairie (Holechek and others, 2004). More conservative utilization rates of 35%-45% of key forage species have been shown to maintain long-term sustainable forage production and better plant community diversity

Alternatives
Planning Area
Pg 121
MA #3 Alt B & Preferred
On allotments found to exceed 50% utilization (is this by weight, ocular, etc.?) at the end of the grazing season, utilization would be measured in every pasture of the allotment at the end of the following grazing season.
Adaptive Management: Adjustments in livestock grazing management (livestock numbers and kind, seasons of use, rest etc.) may occur with additional monitoring* of livestock grazing effects.
Threshold: Two consecutive years of exceeding 50% utilization on a pasture-wide basis. Adjustments would be based on monitoring.
*Additional monitoring includes vegetation attributes such as frequency, cover, density, production, structure and composition. Other non-vegetative attributes that could be monitored are hydrologic function and soil and site stability.
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 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! BLM needs to have monitoring guidelines by weight and implementation actions for these areas.

MA #8 Alt A &Preferred
Yearling cattle factors would be considered through individual AMPs. The animal unit equivalent would be 0.7 for yearling cattle. Yearling factors would only apply to stocking rates and carrying capacities.
SDTWS disagrees with this alternative. To reflect yearling variability, we suggest that yearling cattle AUM adjustment factors be based on actual typical animal weights instead of an assumed 0.7 figure. In addition, if yearlings are going to be charged at the standard AUM rate then they need to be stocked at 1.0 AUM/ animal. Yearlings are close to the weight define as an AUM.

MA #9 Preferred
No change in livestock conversions from cattle, horses, or bison to domestic sheep or goats would be allowed in allotments within current occupied bighorn sheep range.
Distances
SDTWS agrees with the alternative. No conversions and distances with opportunities to change are acceptable.

Exemption Area
Pg 127
MA #13 Alt B & Preferred
To protect other resource values, no new grazing allotments would be authorized in the Exemption Area unless capability criteria are met for 50% of the proposed allotment acres.
The grazing lessee would be required to fence new allotments.
Grazing would also be allowed throughout the Exemption Area for beneficial resource uses such as fuels treatments, weed control etc. Any such treatments would be completed following a site-specific interdisciplinary team analysis.
Capability criteria are as follows: Capable for cattle grazing; slope less than or equal to 30%, range production above or at 200 lbs./acre, wind/water erodibility at slight to moderate. Sheep grazing capability is the same as cattle except the slope cutoff is 45%. Areas not meeting these criteria are shown in Map 2-24.
There would be approximately 1,294 acres capable for cattle grazing outside of existing allotments and approximately 2,435 acres non-capable for cattle grazing. There would be approximately 1,608 acres capable for sheep grazing outside of existing allotments and approximately 2,121 acres non-capable for sheep grazing
SDTWS disagrees with this alternative. Having only 50% of the proposed new allotment meeting capability criteria is way too low; needs to be 75% or greater!
Need to keep new grazing leases out of the Exemption Area. The public lands are extremely fragmented and not conducive to grazing as stated. Due to the fragmentation of the public lands and the continued urbanization adjacent to these public lands the 1,294 acres meeting cattle grazing criteria and the additional 314 acres meeting sheep grazing criteria would not be cost effective to fence and graze. The current ungrazed areas of the Exemption Area need to be left for wildlife. Also the existing allotments need to be evaluated to see if they meet the "Capability Criteria" and the areas that do not meet that criteria need to be removed from those allotments. This area has the potential to be the next bighorn sheep reintroduction area and competition with other livestock is unacceptable. Management actions associated with bighorn sheep range would eliminate the entire Exemption Area from domestic sheep grazing.

Recreation
Alternatives
Pg 131
MA #6 Alt B & Preferred
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.
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 dwellings.
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.
Rules Cited
http://legis.state.sd.us/statutes/DisplayStatute.aspx?Statute=41&Type=Statute
http://legis.state.sd.us/rules/DisplayRule.aspx?Rule=41

Pg 132
MA #7 Alt A, C & Preferred
Same as Alternative A: Fish stocking would be allowed
BLM need to coordinate and consult with SDGFP for fish stocking activities.

Pg 135
MA #19 Alt B & Preferred
Fish stocking would be allowed. Increase fishing opportunities by development of ponds, such as a pond near the Homestake Powerhouses, dependent upon water availability and dam constraints.
In the Black Hill no fish can be stocked without coordination, consultation, and approval granted by SDGPF.

Rules Cited
http://legis.state.sd.us/statutes/DisplayStatute.aspx?Statute=41&Type=Statute
http://legis.state.sd.us/rules/DisplayRule.aspx?Rule=41

Lands & Realty
Land Tenure
Management Common to All
Pg 143
Exchange would be the preferred method of land adjustment; all exchanges must be within South Dakota.
SDTWS disagrees with this management action: Exchanges should be the only method of land adjustment with very few exceptions. Because of the small amount of public lands in South Dakota, a net loss would be unacceptable. The only other alternative to exchange would be if South Dakota BLM would be authorized to sell lands and use that money to acquire other properties in South Dakota..

Alternatives
Planning Area
Pg 144
MA #1 Alternative A, B, C, Preferred
Categories 1, 2, 3
SDTWS does not support this alternative as written due to a lack of alternatives and the need to evaluate different acreages in each of the categories!

Pg 146
MA #4 Alt B & Preferred
Transfer of up to 170 acres of BLM-administered lands to the Black Hills National Cemetery may be allowed, provided that impacts are minimal and the transfer is consistent with management goals and objectives. If the proposed transfer does not occur the land would remain part of the ACEC.

MA #5 Alt B & Preferred
A public land transfer of up to 50 acres or authorization may be considered for facilities if requested by the SD Army National Guard, provided that impacts are minimal and the transfer is consistent with management goals and objectives
SDTWS disagrees with these two alternatives. Any disposal of portions of Ft. Meade ACEC should not occur. This historic area needs to remain intact. The only exception to these disposals occurring would be the acquiring entity needs to purchase equal or greater acres of lands that are adjacent to Ft. Meade ACEC to maintain and protect this important ecotone for wildlife and historic values!

Minerals
Federal Minerals – Withdrawal and Closure Summary
Alternatives
Pg 148
MA #1Preferred
Locatable federal minerals under Fort Meade (6,574 Acres), Fossil Cycad ACEC (320 Acres), and Bear Butte National Historic Landmark (410 Acres) would remain withdrawn/be recommended for withdrawal, while leasable federal minerals and salable federal minerals would be closed (no lease) in these areas (same as Alternative C).
Within the Greater Sage-Grouse PPAs/ACEC, locatable minerals, salable and non-energy leasable minerals would be open with standard stipulations and conservation measures described in the sage-grouse Appendix (V).
This alternative needs to have the "/ACEC" removed to be consistent with the Special Designations Section; Alternatives Specific to the Greater Sage-Grouse Protection Priority Areas (PPAs) ACEC, Preferred alternative that states "No ACEC designation of Greater Sage-Grouse PPAs." This does not specify the acreages that are associated with PPAs.

Leasable Minerals
Oil &Gas
Pg 151
MA #2 Preferred
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.
Again, SDTWS disagrees with this preferred alternative. The development of the greater sage-grouse preliminary PPAs was a science-based process which used multiple data types collected during multiple years. The collaboration between BLM and the SD GFP during the development of the PPAs resulted in the identification of important sage-grouse landscapes within SD. For these reasons, SDTWS questions why only a portion of the identified preliminary PPAs were included in the preferred alternative. The 2008 MOU between BLM and WAFWA members and others stressed the importance of collaboration and science-based decisions for sage-grouse conservation. To exclude a PPA from the preferred alternative suggests that the BLM acknowledges important sage-grouse habitat exists, but chooses not to provide increased protection for their conservation. Considering inadequate regulatory mechanisms were identified as a listing factor for the warranted but precluded listing decision by the USFWS, SDTWS

strongly encourages the BLM to include the full preliminary PPA as considered in alternative C in the preferred alternative.

Literature Cited

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/fish__wildlife_and/fwp.Par.95958.File.dat/SagegrouseMOU.pdf

Renewable Energy

Alternatives

Pg 156

MA #2 Preferred

Grouse PPAs, areas near sage-grouse leks, raptor nests and sharp-tailed grouse leks

Include comma.

Pg 158

MA #4 Alt B, C & Preferred

Require multi-year preconstruction studies to confirm migration, wintering or breeding season concentrations of raptors and other wildlife in proposed renewable energy development areas.

This alternative needs a greater range of alternatives. 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 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.

Special Designations

Management of Livestock Grazing in the Fort Meade Recreation Area ACEC

Land Tenure Adjustments in the Fort Meade Recreation Area ACEC

Pg 163

MA #2 Alt B & Preferred

A public land transfer or authorization of up to 50 acres could be considered for facilities if requested by the National Guard. There would be 15 AUMs removed from the SDSU Allotment.

Pg 164

MA #3 Alt B & Preferred

Up to 170 acres of public land could be considered for transfer to the Black Hills National Cemetery. There would be 22 AUMs removed from the Fort Meade Allotment if the transfer was completed.

SDTWS disagrees with these two alternatives. Any disposal of portions of Ft. Meade ACEC should not occur. This historic area needs to remain intact. The only exception to these disposals occurring would be the acquiring entity needs to purchase equal or greater acres of lands that are

adjacent to Ft. Meade ACEC to maintain and protect this important ecotone for wildlife and historic values as stated in the Land Tenure Section

These two alternatives above also go against Goal #1 which is to: "Protect relevant and important values through Area of Critical Environmental Concern (ACEC) designation and apply special management where standard or routine management is not adequate to protect the areas from risks or threats of damage/degradation or to provide for public safety from natural hazards."

Pg 164
MA #8 Alt A, B & Preferred
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.
SDTWS disagrees with this alternative. This is a limited amount of herbaceous stubble and does not provide much residual cover. With BLM having 100% control on these allotments and wildlife being a priority, at least 6 inches of herbaceous stubble should remain in the riparian areas. Also, there are more areas to consider than remaining inches of stubble.
Note: What happened to the residual vegetation management action from the 1996 FMRA plan ("Utilization on key forage species will not exceed 50% by weight on the upland sites and will maintain the objectives for habitat needed by ground nesting birds.")?

Literature Cited
http://www.blm.gov/pgdata/etc/medialib/blm/mt/field_offices/south_dakota.Par.52374.File.dat/

Management of Special Designations in the Fort Meade Recreation Area ACEC
Pg 170
MA #1 Alt B & Preferred
Transfer of up to 170 acres of BLM-administered lands to the Black Hills National Cemetery requested by the SD Army National Guard, provided that impacts are minimal and the transfer is consistent with management goals and objectives

Pg 171
MA #3 Alt B & Preferred
A public land transfer of up to 50 acres or authorization may be considered for facilities if requested by the SD Army National Guard, provided that impacts are minimal and the transfer is consistent with management goals and objectives.
SDTWS disagrees with these two alternatives. Any disposal of portions of Ft. Meade ACEC should not occur. This historic area needs to remain intact. The only exception to these disposals occurring would be the acquiring entity needs to purchase equal or greater acres of lands that are adjacent to Ft. Meade ACEC to maintain and protect this important ecotone for wildlife and historic values as stated in the Land Tenure Section. These management actions are in this document at least three times!

Alternatives Specific to the Greater Sage-Grouse Protection Priority Areas (PPAs) ACEC
Pg 174
#1 Preferred
No ACEC designation of Greater Sage-Grouse PPAs.
SDTWS agrees that the PPA's designation is adequate at this time.

Public Safety
Management Common to All
Pg 175
Closures of dangerous inactive and abandoned mine sites would be designed to reduce to the risks to human health and safety, restore the environment, preserve bat habitat, and protect some mine sites as cultural resources and meet or move toward meeting Land Health Standards.
SDTWS requests that BLM considers other wildlife that utilizes these abandon mines.