

CONSULTATION AND COORDINATION

PREPARATION

The South Dakota RMP was prepared by specialists from the Miles City District Office, South Dakota Resource Area, Big Dry Resource Area and Powder River Resource Area with assistance and guidance from the BLM, Montana State Office. Disciplines and skills used to develop this RMP were: vegetation and rangeland use, geology, hydrology, recreation, soils, cultural resources, lands, paleontology, economics, wildlife, fisheries, animal science, forestry, community planning, graphics, editing, printing, public affairs and typing. Preparation of this RMP began in 1982 with announcement in the *Federal Register*, Volume 47, No. 108, June 4, 1982.

PUBLIC PARTICIPATION

A letter and brochure explaining our planning process and citing the counties and acreage of public lands involved in the RMP planning were mailed to about 2,000 addressees on June 18, 1982. The letter included a response card for return of comments and for an expression of and desire to remain on the mailing list for further RMP information.

An open house to invite public comment on the scope of the RMP was held on July 12, 1982, at the South Dakota Resource Area Office in Belle Fourche, South Dakota. Announcement of that meeting was made in newspapers and in the above-mentioned letter.

A call for coal resource information was made in the *Federal Register*, Volume 47, No. 166, August 26, 1982 and in letters to about 25 firms and individuals known to be interested in mineral resources.

An update brochure was sent to 765 addressees on May 24, 1983, summarizing the results of scoping and indicating our emphasis would be focused on classification of the public lands for adjustment and on vegetation management for livestock, wildlife and watershed protection.



The Draft RMP was filed with the Environmental Protection Agency on April 26, 1985. The notice of availability was published on April 24, 1985 in the Federal Register. This notice announced a 90-day comment period commencing on April 26 and ending on July 26, 1985.

The Draft RMP was mailed to about 460 addresses on our mailing list and to 439 grazing permittees. News releases provided information on how to obtain copies of the Draft. No public hearings were requested. A public meeting was held May 22, 1985 in Belle Fourche, South Dakota. A total of 16 comment letters and the responses are provided in this chapter.

As required by Section 7 of the Endangered Species Act (P.L. 93-205), the BLM consulted with the U.S.D.I. Fish and Wildlife Service (FWS). The BLM submitted to the FWS a biological assessment for threatened and endangered species. The FWS concurred with BLM's conclusions as noted in comment letters No. 3 and 7 in this chapter.

Official consultation with the Governor of South Dakota was accomplished following the public comment period. After the review of the public comments and the Draft RMP, the Governor provided comments from the State of South Dakota.

AGENCIES AND ORGANIZATIONS CONSULTED

The South Dakota RMP team consulted and/or received comments from and sent copies to the following organizations and agencies during the preparation of the draft and final document:

American Agriculture Movement
American Institute of Mining Engineers
American Mining Congress
ARCO
Audubon Society
Black Hills Alliance
Black Hills, Badlands and Lakes Association
Black Hills Council of Local Government
Black Hills 4-Wheelers
Advisory Council on Historic Preservation
Center of the Nation Sportsmens Club
Deadwood Chamber of Commerce
Hills and Plains Sportsmens Club

Homestake Mining Company
Independent Stockgrowers Association
Izaak Walton League
Lead Chamber of Commerce
National Wildlife Federation
Natural Resources Defense Council
Public Lands Council
Public Lands Grazing Council
Rocky Mountain Oil and Gas Association
Sierra Club
South Dakota Association of County Officials
South Dakota Association of Telephone Cooperatives
South Dakota Association of Realtors
South Dakota Chamber of Commerce
South Dakota Land Users
South Dakota Livestock Association
South Dakota Beef Industry Council
South Dakota County Agents Association
South Dakota Farmers Union
South Dakota Goose Association
South Dakota Independent Oilmen's Association
South Dakota National Farmers Organization
South Dakota Petroleum Association
South Dakota Rural Electric Association
South Dakota Society for Range Management
South Dakota Sheepgrowers Association
South Dakota State Association of Conservation Districts
South Dakota Stockgrowers Association
South Dakota Wildlife Federation
South Dakota Woolgrowers
Sturgis Chamber of Commerce
The Wilderness Society
Western South Dakota Sheepgrowers
Wildlife Society of South Dakota

Local, State and National Government Elected Officials

U.S. Senator James Abdnor
Congressman Tom Daschle
U.S. Senator Larry Pressler

Mayors of:

Faith
Fort Pierre
Sturgis

South Dakota State Senators of the Thirteen Counties, Including:

Leonard Andera
John Brown
James Dunn

Carl Ham
Doris Miner
Lyndell Peterson
Bruce Walker
Dick Waddell

**South Dakota State
Representatives of the Thirteen
Counties, Including:**

George Blair
John Brown
Eugene Christensen
Bernard Christenson
James Emery
Larry Gabriel
James Hood
Kay Jorgenson
Harvey Krautschun
Gust Kundert
N F Lyon
Richard Hagen
Walter Miller
John Manke
G F Mortimer
Gordon Pederson
Roger Porch
Joel Rickenbach
Della Wishard

State Officials of

Governor William J. Janklow
Department of Agriculture
Archaeological Research Center
A-95 Coordinator
Department of Commerce
Department of Economic and Tourism
Development
Bureau of Planning
Office of Energy Policy
Department of Health
State Extension Services
Forestry Division
Geological Survey
Department of Game, Fish and Parks
Department of Education and Cultural Affairs
Department of Labor
Department of School and Public Lands
Department of Revenue
Department of Public Safety
Department of Social Services
Department of Transportation
Department of Military and Veteran Affairs
Department of Water and Natural Resources
South Dakota School of Mines
University of South Dakota

Local Government

County Commissioners of

Brule
Butte
Custer
Fall River
Haakon
Harding
Jackson
Lawrence
Lyman
Meade
Pennington
Perkins
Stanley

Planning Boards

District I
District V
Custer County
Lawrence County
Pennington County
Lead
Rapid City
Spearfish

Wyoming

Planning Coordinator—Governor's Office
Game and Fish Department
Department of Agriculture
Department of Economic Planning and
Development
Crook County

Indian Tribes

Cheyenne River
Crow Creek
Lower Brule
Oglala Sioux
Pine Ridge Sioux
Standing Rock Sioux (North Dakota)
United Sioux Tribes

Federal Agencies

Branch of Onshore Minerals Records—Casper,
Wyoming
Newcastle (Wyoming) Resource Area, Bureau of
Land Management
U.S. Air Force
Bureau of Indian Affairs
Soil Conservation Service
Black Hills National Forest

Custer National Forest
 Nebraska National Forest
 Black Hills Area RC & D
 Office of Mineral Data Analysis—Bureau of
 Mines
 Fish and Wildlife Service
 Jewel Cave National Monument
 Mount Rushmore National Memorial
 Wind Cave National Park
 Federal Highway Administration
 U.S. Geological Survey
 National Park Service
 Badlands National Park
 Office of Surface Mining
 Environmental Protection Agency

for their views on the South Dakota public land planning and resources.

ANALYSIS AND REVIEW OF PUBLIC AND AGENCY COMMENTS

A total of 17 individuals, private organizations, and federal and state agencies submitted comments on the recommendations and analysis contained in the Draft RMP. All the comments were in written form. Table 5-1 lists the contributors.

Individuals

Individual BLM and NFS livestock grazing operators and many individuals were contacted

**TABLE 5-1
 LIST OF COMMENTORS**

Assigned Index No.	FEDERAL AGENCIES
2	Department of the Air Force, Air Force Regional Civil Engineer Central Region, Dallas, TX
5	Department of Agriculture, Soil Conservation Service, Rapid City, SD
6	Department of Agriculture, Forest Service, Nebraska National Forest, Chadron, NE
3	Department of the Interior, Fish and Wildlife Service, Endangered Species, Pierre, SD
7	Department of the Interior, Fish and Wildlife Service, Endangered Species, Pierre, SD
10	Department of the Interior, Fish and Wildlife Service, South Dakota Field Office, Pierre, SD
15	Department of the Interior, Geological Survey, Reston, VA
9	Department of the Interior, Office of Surface Mining, Denver, CO
12	Department of the Interior, National Park Service, Rocky Mountain Regional Office, Denver, CO
11	Environmental Protection Agency, Region VIII, Denver, CO
STATE AGENCIES	
1	South Dakota, University of South Dakota, Department of Cultural Affairs, Historic Preservation Center, State Historic Preservation Officer, Vermillion, SD
17	State of South Dakota, Office of the Governor, Pierre, SD
ORGANIZATIONS	
13	ARCO Exploration Company, Denver, CO
14	Homestake Mining Company, Golden, CO
16	Rocky Mountain Oil and Gas Association, Inc., Denver, CO
8	Wildlife Society, South Dakota Chapter, Rapid City, SD
INDIVIDUALS	
4	Terry Z. Riley, Spearfish, SD

**HISTORICAL
PRESERVATION
CENTER**

University of South Dakota
Vermillion, S.D. 57069
Phone (605) 677-5314



Chris Roholt
Project Manager
Miles City District Office
Bureau of Land Management
P.O. Box 940
Miles City, MT 59301

Technical Assistance - NEPA/NHPA Coordination
Project: 850422001 - Resource Management Plan (Draft)
Location: South Dakota Resource Area, BLM

Dear Mr. Roholt:

A review has been completed of the draft plan, dated April, 1985. The State Historical Preservation Center offers the following evaluation as a part of the coordination between the National Environmental Policy Act and the National Historic Preservation Act:

1. The alternatives are succinctly and effectively presented, accompanied by informative tables, charts, photographs, and drawings.

2. Cultural resources are addressed in summary in Chapters 2 (the program), 3 (known resources) and 4 (consequences with improved range conditions). Page 23 is a chart that summarizes cumulative impacts on all resources, stating that "the impacts on the cultural resource would be insignificant" for any alternative.

1-1 3. The Center does not agree with an inclusive statement such as the above. Further, the plan states on Page 53 that ground cover and erosion are related to range conditions which would benefit cultural resources.

1-2 Hoofed animals can adversely impact cultural resources. Increased cattle access to a prehistoric village, stage coach/freight station, military facility, abandoned ranch structures and certain other kinds of sites can result in further disruption and disturbance to fragile resources. Changes in drainage patterns, paths, access to water, erosion conditions and other consequences of intensive cattle use can result in adverse impacts to cultural resources.

1-3 4. Since very little of the BLM administrated land in South Dakota has been surveyed for cultural resources, it is impossible to know if the impacts of grazing and varied patterns of land use would be insignificant. The significance of impacts can only be determined if the cultural resources are known.

The Office of Cultural Preservation of the Department of Education and Cultural Affairs coordinates South Dakota's archaeological research, museums, historical preservation and historical resource in a program designed to preserve our natural and cultural heritage.

1-1 As explained under Management Guidance Common to All Alternatives it is BLM policy to consider the effects of proposed BLM actions on cultural resources as a part of project level planning. Policy measures to protect significant cultural resources include intensive inventory to identify significant cultural resources before ground disturbing actions are authorized and before lands are transferred from public ownership. Adverse impacts to significant sites are then avoided or mitigated by recovering scientific or historic data.

Even with all of these precautions, standard inventory practice may not identify prehistoric sites which are buried and have no surface manifestation. It is therefore remotely possible that an undiscovered cultural resource may be damaged or destroyed by a BLM action. However, taking into account slight benefits to cultural resources from improved range condition and a low probability for inadvertent adverse effects from BLM actions, the cumulative impacts on cultural resources are judged insignificant.

1-2 While increased livestock use of areas containing cultural resources may adversely impact significant sites, BLM proposes under the RMP to improve range condition and livestock distribution. The proposals for vegetation apportionment under each alternative should reduce livestock damage to cultural resources.

1-3 See replies 1-1 and 1-2. While impacts to specific cultural resources are not yet known, the nature of anticipated impacts are understood in the context of the types of BLM actions planned, existing policies for the treatment of cultural resources, and the nature of cultural resources likely to exist in this part of the Northwestern Plains.

Rehott (BLM)
May 2, 1985
Page 2

1-4 | 5. The following statement is circuituous, as well as being against the intent of Section 106 of the National Historic Preservation Act:

"The impacts of all actions on cultural resources would be insignificant. Any site which is inadvertently destroyed would be irreversibly and irretrievably destroyed (p. 54)."

a. Site destruction is not an insignificant impact.

b. It is possible that sites are being damaged or destroyed, but this can not be known until the responsibility is met by the BLM to inventory the entire area for cultural resources. To only survey those parcels that will undergo energy development, exchange or sale, will produce unsystematic, piece-meal and costly studies. It would be cheaper and more efficient for the BLM to conduct a large scale survey of the entire area. The current piecemeal efforts occur over a very long span of time, during which grazing and soil erosion will continue to adversely affect the integrity of cultural resources.

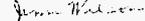
c. A destroyed site is a destroyed site. A damaged site is a damaged site. A site being destroyed or being allowed to undergo non-benign neglect can be recorded, protected, and preserved for the future.

6. The Center recommends Alternative B, since it provides for the greatest consideration of concerns for multiple-use of the land. It is the alternative that should produce the most improved range conditions. The Center concurs that "improved range condition would benefit cultural resource sites by increasing ground cover and reducing erosion."

1-5 | 7. The Center recommends that the BLM undertake a comprehensive inventory of all cultural resources on BLM land.

The organization of the plan is extremely effective. The Center welcomes the opportunity to comment on it. Please address further comments or concerns to James Wilson at the Center. Your consideration for the heritage of South Dakota is appreciated.

Sincerely,



J. R. Fishburne
State Historic Preservation Officer

psm

cc: R. Alex, State Archaeologist, Ft. Meade

1-4 The summary of environmental consequences to cultural resources was changed in response to this comment. It now clarifies the judgment that cumulative impacts are insignificant (see responses 1-1 and 1-2).

1-5 As the FEIS, "As time and funds permit, the BLM will continue to conduct inventories under the Cultural Resource Program to find and document cultural properties which qualify for the National Register."



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242

8 MAY 1985

Mr. Chris Roholt, Project Manager
Miles City District Office, BLM
P.O. Box 940
Miles City, MT 57301

Dear Mr. Roholt:

Thank you for allowing us the opportunity to review the Draft Resource Management Plan/Environmental Impact Statement for the South Dakota Resource area.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently several Air Force air operations including instrument flight training routes traverse a portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2514, or FTS 729-2514.

Sincerely,

DON-MICHAEL BRADFORD, Captain, USAF
Director, Environmental Planning Division

Cy to: HQ USAF/LEEV

2-1

2-1

Your comment has been considered but there was no response or change in the document required.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
XX
POST OFFICE BOX 250
PIERRE, SOUTH DAKOTA 57501

IN REPLY REFER TO:

May 24, 1985

Mr. Billy McIlvain
Area Manager
South Dakota Resource Area
Bureau of Land Management
310 Roundup Street
Belle Fourche, South Dakota 57717

Dear Mr. McIlvain:

This is in response to your request for comments on the draft Resource Management Plan, South Dakota Resource Area, dated April 1985.

3-1

We concur with your conclusion that federally endangered species which may occur in the Resource Area are the black-footed ferret, the whooping crane, the bald eagle, the peregrine falcon, and the Eskimo curlew. We suggest "southern" be dropped from bald eagle since a distinction is no longer made between the northern and southern subspecies. The State endangered and threatened list also appears to be correct.

As you may already know, the interior least tern and piping plover have been proposed as endangered and threatened species, respectively. It is possible that one or both species may be officially listed before the Management Plan is finalized. The least tern occurs on the Cheyenne River primarily below the Highway 34 bridge, on islands in Oahe Reservoir, and on Missouri River sandbars. The piping plover nests along the shoreline of alkaline wetlands, beaches, and islands.

Sincerely yours,

Wallace G. Jobman
Acting Endangered Species Project Leader

3-1 The document has been changed to reflect this comment.



TO: Chris Roholt, Project Manager
Miles City District Office
Bureau of Land Management
PO Box 940
Miles City, Montana 59301

FROM: Terry Z. Riley
926 Pinedale Drive
Spearfish, SD 57783

Dear Mr. Roholt:

I am responding to your request for comments on the draft Resource Management Plan, South Dakota Resource Area, Miles City District, April 1985. I have read the plan and would like to compliment the project team that prepared it. I do have several comments on the plan

- 4-1 | 1. In the plan you imply that the range is in fair, good or excellent condition. It is not clear to me that you have any range poor or worse condition. I believe it is unrealistic to state that there no range administered by the BLM in South Dakota in less than fair condition. I have administered rangeland in South Dakota for nearly four years now and I do not believe all of the rangeland on the BLM in this state is in fair condition or better.
- 4-2 | 2. On page 18, seventh paragraph, you say the area will continue with the four existing allotments, and the grazing systems could include rest and deferred rotation, deferred or seasonal use, or other methods. I believe this statement implies the BLM will continue to use any system available; however, it does not say anything about a preferred system. Range management has come a long way in the last 20 years. Many ranges have been restored to good or excellent condition through the use of intensive grazing systems. I believe the area should strive to implement intensive systems such as rest-rotation or deferred-rotation on all of their rangelands. Just saying you will use anything really doesn't say much for the professional range managers in the area.
- 4-3 | 3. On page 18, second paragraph, you say the 1331 acres of riparian vegetation will be fenced to protect it from livestock. This really doesn't tell the reader how much riparian vegetation there is on the area. If the 1331 acres is 90 percent of the total riparian vegetation on the area, then say so. The reader will get a much better picture of how you intend to manage the riparian vegetation on the area. If you aren't going to protect it all, how do you intend to manage the rest of it. Total protection of riparian areas may not be the most appropriate management option. Short duration low intensity grazing at non-critical periods may be more appropriate.

- 4-1 | The joint range survey for this project, using SCS technical guides and professional expertise of BLM and SCS personnel, did not identify any acreages of poor condition range.
- 4-2 | The grazing management system discussion is not meant to specify which system or method should be applied to each allotment. Selection of a system to resolve resource problems and to meet allotment objectives will be done by the professional working on the allotment.
- 4-3 | The document has been changed to reflect your comments. See Chapter 3, Soils and Range Sections. There are approximately 1,560 acres of riparian habitat on BLM administered land within the Resource Area. Areas inventoried were limited to perennial and intermittent streams containing woody vegetation. Woody pockets outside of riparian areas are limited and were not inventoried. Of the approximately 1,560 acres of riparian habitat, 1331 of these acres are being grazed by livestock. The remaining acres are ungrazed by livestock. We recognize that fencing all riparian areas in an effort to exclude livestock may not be the best management approach. We will consider short duration grazing during noncritical periods, however, the majority of these riparian areas are located on summer range and do not lend themselves well to winter grazing.

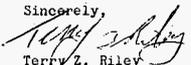
4-4 | 4. I believe you need a much more intensive monitoring plan. You need to insure that all resources are responding to planned management.

5. Your dealing with wildlife habitat management is very superficial. I believe you again are saying the BLM is going to do anything they want, and not identifying which species or what habitat management practices will be implemented. You have not made much reference to woody draws in the plan. I am assuming you are lumping woody draws in with riparian vegetation. This is perfectly acceptable, but it should be made more clear if that is the case.

4-5 |

Thank you for allowing me the opportunity to comment on this plan.

Sincerely,


Terry Z. Riley
Certified Wildlife Biologist

4-4 See the Planning Overview section in Chapter 1 as discussed in the response to 10-2 and 11-12, a detailed monitoring plan will be developed prior to implementation of the proposed alternative. It will provide guidance for monitoring of resource conditions.

4-5 See response to 4-3.



United States
Department of
Agriculture

Soil
Conservation
Service

Federal Bldg., Room 239
515 9th Street
Rapid City, SD 57701

June 18, 1985

L
mcd

Billy Mc Ilvain, Area Manager
South Dakota Resource Area
Bureau of Land Management
510 Roundup Street
Belle Fourche, SD 57717

Dear Mr. Mc Ilvain:

I attended the BLM public meeting where the Resource Management Plan/
Environmental Impact Statement for the South Dakota Resource Area was
discussed.

5-1 Several questions were asked concerning various alternatives. Under
the vegetative apportionment of the preferred alternative and alter-
native D, an alternative to range improvement is converting 7,372
and 6,725 acres respectively. I question why you would consider
converting native rangeland to tame pasture. Tame pasture needs
to be reestablished in order to keep productivity high. Pages 73
and 74 also indicate 6,725 acres are to be converted annually to
increase forage.

Table 2-3 Summary of the Cumulative Impacts under affected resource
soils show insignificant soil loss of 245 acre feet (Preferred
Alternative), 261 acre feet (Alternative C), and 227 acre feet
5-2 (Alternative D). This seems like a considerable amount of soil loss
depending on the acres involved.

Sincerely,

Rodney D. Baumberger
Rodney D. Baumberger
Range Conservationist



The Soil Conservation Service
is an agency of the
Department of Agriculture

SCS-AS-1
10-79

5-1 Conversion of some native range to tame pasture is a viable method for
increasing forage production. SCS soil surveys show that production
increases of up to 400-500% are possible with conversion on some soils.
Only lands meeting feasibility requirements (soil capability, area size,
need, conflict abatement or resolution, benefit/cost comparisons, etc.)
would be converted. The figure of 6,725 acres is for a 15 year period. It is
not an annual figure as was stated in the DEIS on page 74. The FEIS has
been corrected accordingly.

5-2 These estimates are computed based on the maximum allowable rate of
erosion without loss of soil productivity. It is important to note that these
estimates are totals over the 15 year life of the RMP and not an annual
rate. (See response to 5-1.)

UNITED STATES DEPARTMENT OF AGRICULTURE



FOREST SERVICE

Nebraska National Forest
270 Pine Street
Chadron, Nebraska 69337

In Reply Refer To:

1920

June 17, 1985

Chris Roholt, Project Manager
Miles City District Office
Bureau of Land Management
P.O. Box 940
Miles City, MT 59301

Dear Mr. Roholt:

I appreciate receiving a copy of the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the South Dakota Resource Area. Since the Nebraska National Forest administers over 700,000 acres of National Grasslands in South Dakota, we are deeply interested in the Bureau of Land Management's programs in that area and we are always prepared to cooperate with a sister agency in any way we can. My staff and I have reviewed your document and have very few comments. I certainly support your goals of improving range condition and riparian habitat; goals which we have also identified for the National Grasslands. I do find your map misleading as it shows some of the lands administered by the Forest Service, but, not all. It might be better to just depict "other Federal public lands" rather than try to map and label all of them, or you may not want to show other agency lands at all in order to simplify your mapping efforts. If you decide to display "other Federal public lands", then please include the National Grasslands on your final map so that the public will know where these lands are located in relation to the other public lands in South Dakota. I am enclosing a Forest Plan map from our planning documents so that you can see where these lands are located. If you have any questions, please contact the Forest Planning Officer, Chuck Harnish, at this office.

Thank you for including us in your scoping process and I look forward to seeing your final documents.

Sincerely,


ROBERT L. STORCH
Forest Supervisor

Enclosure



FS-6200 (2/17-82)

7-1

7-1

If changes are made in project plans or operating criteria, or more information becomes available, the BLM will consult with the Fish and Wildlife Service.

July 8, 1985

Mr. Chris Roholt
Project Manager
Miles City District Office
Bureau of Land Management
P.O. Box 940
Miles City, MT 59301

Dear Mr. Roholt

The South Dakota Chapter of the Wildlife Society has reviewed the "Draft Resource Management Plan - South Dakota Resource Area," and we have many comments regarding the Plan.

As you may be aware, the Chapter is a private non-profit organization composed of 100 members who are professional wildlife biologists, managers and administrators. They represent numerous state and federal agencies and institutions. Chapter members are dedicated to the management, restoration and conservation of natural resources of not only South Dakota, but the nation as well. Nearly all of these individuals are in this line of work because of their strong interests in outdoor sports and recreational activities which includes use of public lands for these purposes.

- 06
- 8-1** On page 8, the plan states that 77.3 percent of the lands suitable for grazing are in good or excellent condition. Additionally, it implies that all BLM lands are in excellent, good or fair condition and it is not clearly stated if any are in poor condition. What standards were used to establish these range classes? We seriously question whether all BLM lands in South Dakota are in fair, good or excellent condition, even considering the areas in which they are located, and that 77.3 percent of the land is in good to excellent condition. If this is indeed true, the standards are so loose that a severe tightening up is required.
- 8-2** Additionally, these figures do not jibe with SCS figures for their 1979 River Basins Study. SCS stated that 50 percent of native ranges, and 70 percent on tame pastures were in continuous heavy use and overgrazed. This included both public and private land, and there seems to be a tendency to abuse public land more than private by most operators. If these percentages are incorrect, and we believe they are, then all other figures derived from them are also incorrect.
- On page 15, under preferred alternative, short and long term AUM increases, it would seem that the preferred alternative is somewhat out of line. Should not the preferred alternative be to raise the level of all BLM administered lands to a level of true excellence for their location as soon as possible in the most expeditious manner possible. Such a goal may require reductions in AUM's in conjunction with changes in grazing management, range improvements and mechanical
- 8-3** treatment. At any rate, no AUM increases should be allowed until the land affected is in a true excellent condition.
- 8-4** We object to the conversion of any native grassland to tame pasture (page 15 and 18). This part of the plan (7,372 acre conversion) should be stricken.



- 8-1** See response to 4-1.
- 8-2** The Western South Dakota River Basins study cited in the comment states, "Almost half of the total rangeland is in continuous heavy use and is being overgrazed. The range condition is poor on a portion of rangeland and needs to be reseeded."
- Analysis of the values in the cited document shows:
- a. 18,921,600 acres of range in the study (pg. A-14)
 - b. 7,806,747 acres of range in continuous heavy use (pg. 3-2)
 - c. 1,348 acres in need of reseeding, poor (pg. 3-2)
- $100 \times 7,806,747 / 18,921,600 = 41\%$ of study are in continuous heavy use
- $100 \times 1,348 / 18,921,600 = .007\%$ of study area in need of reseeding, poor
- We do not consider .007% to be a significant acreage. Also, close study of the River Basins document and BLM records indicates that BLM administered public lands were not included in the study (see acknowledgments on page 101).
- 8-3** Increases in livestock AUMs will not be authorized unless monitoring shows that additional forage is permanently available and management objectives are being met and in accordance with regulations.
- 8-4** See response to 5-1.

Mr. Chris Roholt
July 8, 1985
Page 2

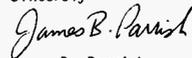
8-5 The statement on page 18 concerning continuation of the four existing allotment management plans implies that BLM will at its discretion use any grazing system available or not at all. Such arbitrary statements do not speak well for professional range management. Certainly you can be more specific than indicated here.

8-6 Riparian habitat has been adversely impacted by past grazing practices. The plan (page 18) calls for 1,331 acres of riparian areas to be managed. What percentage of the riparian areas available for management does this figure represent? If 1,331 acres is not the total riparian area available, how will the rest be managed? Will low intensity grazing during winter be practiced on the areas or what other practices are being considered? If woody draws are not covered under riparian habitat, they have been completely overlooked and are high potential wildlife areas.

The Resource Management Plan for the South Dakota Resource Area seems to have been painted with a broad brush. The portions of the plan dealing with wildlife were lightly touched upon and lack significant detail and description.

Thank you for the opportunity to comment.

Sincerely



James B. Parrish
President, Acting

JBP:mg

8-5 See response to 4-2.

8-6 See response to 4.3



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

July 16, 1985



MEMORANDUM

TO: Chris Roholt, Project Manager, Bureau of Land Management, Miles City District Office

FROM: Mel Shilling, Chief, Mining Analysis Division *Mel Shilling*

SUBJECT: Review of Draft Resource Management Plan/Environmental Impact Statement (DEIS), South Dakota Resource Area, Miles City, MT

We have reviewed the subject DEIS as requested and make the following comment:

9-1 Page 54: The DEIS states "Disposal of the Federal surface over reserved leasable minerals would have the impact of: (1) reducing the BLM workload of checking reclamation from exploration ...". This is an incorrect statement because pursuant to 43 CFR 3410.2-2(b) "... include in each exploration license requirements and stipulations to protect the environment ... and to ensure reclamation of the lands disturbed by exploration." Thus, the BLM workload of checking the reclamation requirements for exploration will not be reduced.

The BLM retains the responsibility for the reclamation requirements for exploration on all Federal lands including private surface over Federal minerals prior to implementation of mining under an approved SMCRA permit and outside of a SMCRA permit boundary. See section 30 CFR 740.4(d) and (e), 43 CFR 3410.1-1 and 3482(a) and 3482.2(a).

Thank you for the opportunity to comment on the DEIS. Please let us know if we can be of further assistance.

0003F Blake:ch

9-1 The document has been changed to be consistent with 43 CFR 3410.2-2(b).



United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Dakota Field Office (ES)
Post Office Box 986
Pierre, South Dakota 57501

July 22, 1985



MEMORANDUM

TO : Project Manager, Bureau of Land Management
District Office; Miles City, Montana

FROM : Field Supervisor, Ecological Services
SD Field Office; Pierre, South Dakota

SUBJECT: Review of Draft Resource Management Plan/Environmental
Impact Statement (RMP/EIS) for the South Dakota Resource Area
(EC-85/34)

Five management alternatives involving two issues are described for the Bureau of Land Management areas in South Dakota. The alternatives provide a range of choices from resource protection to resource production. The two issues discussed in each alternative are vegetation apportionment and land actions. The Preferred Alternative, a composite of three alternatives, addresses the requirements of BLM mandates and avoids the extremes of the single-use alternatives.

General Comments

Vegetation Apportionment. The Preferred Alternative would increase available wildlife forage the least of the five alternatives presented. The RMP projects an 11.2 percent increase in livestock AUMs from the present 45,305 AUMs to 50,367 AUMs, a 5,062 AUM increase. Forage available for wildlife would appear to increase 11,705 AUMs or 10.1 percent (Summary, Page i), but the projected increase of 11,705 AUMs is for a combination of rangeland, watershed, wildlife forage, and wildlife cover. Each needs to be addressed as separate entities in the RMP/EIS and assigned AUM values to show how much each now contributes to the expected increase. Also, to adequately address wildlife benefits in the RMP, a statistical analysis of AUMs currently available for wildlife forage and wildlife cover and the projected future of AUMs available for each need to be presented. Unfortunately, too often the wildlife "share" is the 10 percent left over after other uses have taken everything fit to eat.

Land Actions. Many parcels of land administered by the BLM in South Dakota are small, isolated tracts. Lack of legal access and small size present numerous management problems. We concur that some land ownership adjustment is necessary to enhance multiple-use, resource management on public lands. The Preferred Alternative categorizes 85,000 acres with

10-1

10-1

Wildlife forage is addressed in combination with watershed and wildlife cover (nonconsumptive uses) throughout the document (see discussion in Chapters 2 and 4). These are specific allocations to these resources.

potential for disposal. Disposal would include 95 percent exchanges and 5 percent sales. Land exchanges to consolidate larger tracts, gain public access to other tracts, and acquire lands with greater public resource values are preferred. However, any sale of public lands must be approached cautiously. Public sentiment runs high over any proposed reduction in public land and the precedence such sales may set. We recommend land exchanges over sales, gaining legal access with no reduction in the public land resource. Land exchanges of small, unmanageable units with state-owned school lands could facilitate blocking for better management as well as enhance the potential sales for the state.

Specific Comments

10-2 Page 9. Vegetation Monitoring and Evaluation. This section needs to be expanded by a more detailed discussion on how the monitoring and evaluation will take place. Monitoring plans for the wildlife, watershed, and grazing management programs should be included in the RMP/EIS. Monitoring efforts should not focus entirely on allotments in the Improve Category. Only 11 percent of the total acreage is categorized as Improve while 50 percent is Maintain and 39 percent is Custodial. We concur that monitoring in allotments categorized as Custodial would be difficult and impractical. However, monitoring efforts should be implemented in both the Improve and Maintain categorizations.

10-3 Page 12. Any sales of public lands must meet certain listed criteria. If any BLM lands are identified for disposal that meet these criteria, they need to be listed and identified by legal description in the RMP/EIS.

10-4 Page 14. Areas of Critical Environmental Concern (ACEC). The criteria for ACEC needs to be presented and described.

10-5 Page 38. "Range surveys and adjudications in the late 1950's and early 1960's established current livestock and wildlife apportionments." Most of the range surveys were completed at least 20 years ago. This data needs to be updated. Current apportionments should be based on both historic and current data.

10-6 Page 40. Little emphasis has been directed to locating critical areas for wildlife on BLM lands. These areas need to be identified and managed appropriately.

10-7 Page 56. In the Preferred Alternative, seven allotments would receive deferments of livestock use on 6,082 acres of fragile soils during the wet spring season, and livestock use would be excluded on 1,331 acres of manageable riparian areas. The RMP/EIS should illustrate how many acres of fragile soils and riparian habitat now exist. More emphasis needs to be placed on the management of these two important items.

J. ... Hamby

cc: BLM; Belle Fourche, SD
FWS/EC; Washington, D.C.
FWS/HR; Denver, CO

JBS:sm/ca

10-2 Monitoring will focus on I category allotments (No. 1 priority) and M category allotments (No. 2 priority).

10-3 There is a resource management plan map in the back of the RMP which shows the areas of disposal and retention. The lands within the disposal area met the disposal criteria, but the lands within the disposal areas will be assessed on a case-by-case basis and offered for sale or exchange as funding and interest dictate.

10-4 The document has been changed to reflect your comment.

10-5 Current apportionments are the result of the actions discussed and have been modified in the intervening years based on actual use, utilization and trend information. The current efforts (RMP/EIS and monitoring) is a continuation of that process.

10-6 We have put considerable emphasis on locating critical wildlife areas on publicland. We work closely with the South Dakota Department of Game, Fish and Parks in locating, inventory and protection of these known critical areas.

10-7 There are 30,436 acres of fragile soils and 1,560 acres of riparian. These figures have been added to the Soils and Range sections of Chapter 3, in response to your comment.

This EPA comment is composed of two items—a cover letter and an attachment. The cover letter summarizes the more specific comments of the attachment. It is appropriate, based on discussion with EPA, to respond to the specific comments in the attachment rather than the general summarizations.



JUL 25 1985

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413



Ref: BPM-EA

Chris Roholt
Project Manager
Miles City District Office
Bureau of Land Management
P.O. Box 940
Miles City, Montana 59301

Dear Mr. Roholt:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the South Dakota Resource Area Draft Resource Management Plan and Environmental Impact Statement RMP/EIS. The EPA acknowledges the BLM decision process to provide a major emphasis on two major Resource Area issues, vegetation apportionment and lands, in meetings its management goals. The RMP process will provide the BLM a broad planning mechanism to identify more specific activity planning requirements for the management of particular resources.

Since most of the Resource Area surface estate will be managed for watershed, wildlife and livestock resources, EPA's primary environmental concerns reflect surface water quality impacts related to proposed management practices. Additionally, we have concerns associated with potential ground-water quality degradation from oil and gas activities. In order to alleviate these environmental concerns, the Final RMP/EIS should emphasize: clarification of non-point source water quality impacts and controls; integration of watershed activity planning with adjacent non-public lands; riparian ecosystem protection policies; potential environmental problems of noxious weed control; and oil and gas well monitoring and abandonment.

The RMP discusses and EPA's comments emphasize the role that resource impact monitoring will play in the evaluation, selection and modification for the most beneficial multiple-use of resources. We recommend the Final RMP/EIS pursue in greater detail particular monitoring methodology and prioritization of implementation activities given the probability of budget and manpower constraints.

EPA is aware of the internal activity planning and management as well as external jurisdictional problems the BLM must contend with in administering widely dispersed land parcels of varying size and accessibility. The Final RMP/EIS presents an opportunity to identify other local, State and Federal agencies and their responsibilities and capabilities in assisting the BLM in developing resource management plans. This coordination will help to ensure that planning is consistent with both the RMP and cooperating agency objectives.

11-1

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11-1

See Chapter 5 for a list of other governmental entities. There are no known inconsistencies between this RMP and official plans of any other Federal, State, or local agency.

Based on our review we have rated this RMP/EIS as EC-2. This means that EPA has identified environmental impacts that should be avoided to fully protect the environment. Corrective measures may require modification of the Preferred Alternative or mitigation measures to reduce environmental impact. Our detailed comments show the RMP/EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. EPA is available to work with the South Dakota Resource Area to reduce these impacts. For further EPA assistance, contact Mike Hammer of my staff at (303) 293-1716 or FTS 564-1716.

Sincerely,

Dale Vodehnal, Chief
Environmental Assessment Branch

cc: Dean Stepanek, BLM State Director
Billy McIlvain, Area Manager, South Dakota Resource Area
William Dickerson, A-104 (OFA)

EPA COMMENTS ON DRAFT SOUTH DAKOTA
RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

We appreciate the procedures and analysis which resulted in the identification of the two major issues, Vegetation Apportionment and Lands, that have received primary consideration in this RMP/EIS. EPA does have additional specific resource management concerns as noted in our following comments.

Water Quality/Soils

- 11-2 Much of the South Dakota Resource Area (SDRA) is subject to potential extensive soil erosion which contributes to sedimentation impacts on surface water quality. As noted, a majority of these lands are grasslands with livestock grazing allotments. We were unable to find a discussion of how the BLM National Non-point Source Strategy will be implemented or what best management practices (BMPs) will be applicable to particular allotment classifications.
- 11-3 Alternative D which "emphasizes intensive management while protecting riparian areas and fragile soils", identifies fragile soils (30,436 acres) to be managed for a deferment of livestock use during the wet season of the year and 1,560 acres of riparian areas which would be excluded from livestock use. The Preferred Alternative proposes livestock exclusion from 1,331 acres of manageable riparian areas and an adjustment of livestock use on 6,082 acres of fragile soils during the wet season of the year. The 1,331 acres designated as manageable riparian areas under the Preferred Alternative reflect an activity planning concern for a major portion of the 1,560 acres identified in Alternative D, however, it would be helpful to know the working definition of manageable riparian areas.
- 11-4 We applaud the planning activities associated with the proposed riparian area management. It would be helpful if the EIS presented additional discussion on how BLM plans to manage these areas. Will their primary function be to act as a sediment removal and filtering mechanism for surface water sources or will they be managed to provide wildlife habitat or both?
- 11-5 We were unable to find a discussion of why the 30,436 acres of fragile lands identified in Alternative D was reduced to 6,082 acres recommended by the Preferred Alternative for adjustment of livestock use during the wet season of the year. This reduction could have significant impacts on increased soil erosion and eventual delivery to surface water resulting in increased sedimentation. We recommend the final EIS provide a discussion of these additional fragile lands and why they are not recommended for inclusion in the Preferred Alternative.
- 11-6 Extensive surface water quality studies and reports exist and/or are ongoing which are available to assist the BLM in activity planning. Since much of the BLM surface managed lands will remain in relatively small isolated

- 11-2 It is BLM policy to prevent further water quality degradation not necessarily to improve water quality. BLM, in its commitment to National Nonpoint Source Strategy, will attempt to reduce sediment product through vegetative allocation and manipulation. As fair condition land in I and M category allotments are improved to good or better range condition, sediment production and erosion are expected to decrease. Water quality will improve as a result. The document has been changed in Chapter 3 to reflect your comments.
- 11-3 For the purpose of this document the definition of manageable riparian areas are those riparian areas presently being grazed by livestock. Also see response to 4-3.
- 11-4 The function of riparian areas will be to act as a sediment removal and filtering mechanism, as well as providing wildlife habitat (i.e. both).
- 11-5 All fragile lands will be treated in the Proposed Alternative. The 6,082 acres are found on allotments to be managed under Alternative D in the Proposed Alternative. The remaining fragile soils acres will also be managed to eliminate fair range condition and fragile soil status. Erosion rates will be reduced from all fragile soils. The major reason for the difference in soil loss and sedimentation between the Proposed Alternative and Alternative D is the increased amount of possible tame pasture development in the Proposed Alternative.
- 11-6 The management of the 6,082 acres of fragile lands will reduce erosion from present levels. If monitoring shows unacceptable erosion conditions on other lands (including identified fragile) management actions will be taken to resolve those problems, as well.

11-7 tracts until the exchange or repositioning of public lands in the SDRA can be accomplished, BLM water-quality related activity planning will need to be closely coordinated with applicable goals and recommendations of the 6th Planning District's Section 208 Water Quality Management Plan and analysis such as the 1984 South Dakota Water Quality Assessment Report under Section 305(b) of the Clean Water Act.

Oil and Gas

11-8 Page 14 references the 1980 Programmatic Environmental Assessment (EA) prepared by the Miles City District, as the policy document for oil and gas activity management in the Resource Area. Since the industry is expressing more interest in injection recovery methods, we suggest that BLM's policy be updated to reflect coordination responsibilities with the EPA and the South Dakota Department of Water and Natural Resources (DWRNR). The newly delegated Underground Injection Control (UIC) Program to the State of South Dakota provides the DWRNR authority over oil and gas wells on federal land. This action will require coordination between BLM and the State. The State will not have authority over oil and gas activities on Indian Lands, hence BLM will need to coordinate those permits for oil and gas injection wells with EPA.

11-9 The Application for Permit to Drill (APD) discussion in Appendix D on page 99 shows the application to provide operational and geologic information required by BLM. If reasonable, we suggest the information required be broadened to include necessary UIC information required by the State and EPA. Copies of the APD, for those wells on Federal lands should be sent to DWRNR's Office of Drinking Water, attention of Mr. Garland Erbele. Send APD copies for activities on Indian Lands to Mr. Mike Liuzzi, EPA, Drinking Water Branch, Ground Water Section.

11-10 EPA recommends the BLM explore establishing a funding mechanism for those wells that have been improperly abandoned and are discovered after the operator has been released from his bond. We understand that such a situation may exist in Harding County where gas leaks have been detected at abandoned wells. This fund would be used to properly abandon wells. All improperly abandoned wells need to be identified to the DWRNR or EPA. This information will benefit both agencies involved, in that, if an improperly abandoned well falls within an "area of review" (1/2 to 1/4 mile radius) of a proposed injection well, the UIC program provides authority to have the well properly abandoned by the operator of the proposed injection well.

Range Treatment

Page 35 and 36 discuss range condition, production and trend. Areas classified as less than good condition are attributed to several factors including livestock overuse, noxious weeds or prairie dogs. Under the Preferred Alternative on page 56 noxious weed control and prairie dog management are offered as range treatment measures. The Final EIS needs to

11-7 BLM will continue to coordinate its planning and management activities with the Sixth Planning District.

11-8 BLM stipulates that a State UIC permit is required for approval of an APD for a water injection well or water disposal well on public mineral. Similarly, BLM stipulates that an EPA UIC permit is required for approval of an APD for a water injection well or water disposal well over Indian Trust Minerals.

11-9 Currently, the UIC information is not required nor does BLM have a written agreement with South Dakota concerning permitting procedures for Federal UIC wells in South Dakota. However, see the response to 11-8.

11-10 An evaluation of the purported leaking wells has been made. The finding was there is no potential hazard to the environment or detrimental concerns to life forms from the wells on public land.

- 11-11** include a discussion of what control and management measures will be used. Which herbicides will be used which might require applicator certification? What poisons may be used to manage prairie dog populations? What are the potential environmental impacts of these control/management measures?

Monitoring

- 11-12** The RFP process provides an excellent vehicle for the BLM to make use of existing BLM resource evaluations and studies in assessing the direction future activity planning should take. Additionally, the process affords the BLM the opportunity to enlist the aid of local, State, and Federal agencies in planning and implementation of the management plans. This interactive process can be expanded further to define individual agency monitoring capabilities and responsibilities. The following comments related to monitoring are offered for your consideration:

- While much of the Resource Area is susceptible to soil erosion the areas designated as fragile soil areas deserve site-specific monitoring plans. All plans should be designed to evaluate not only erosion rates but also delivery rates to impacted surface waters.
- Identify required chemical and biological monitoring, for each proposed activity.
- Establish surface and sub-surface water quality monitoring responsibilities of the BLM, mineral estate lease holders and local, State and Federal Agencies.
- Discuss corrective actions that could be taken in situations which could arise (other than amending or revising the RMP) when problems are identified during monitoring.
- Emphasize the coordination and need for approval of the monitoring and remedial action plans by other relevant agencies including State water quality, the Soil Conservation Service and Wildlife agencies

- 11-11** Physical, biological, thermal, or chemical methods would be used as necessary. The most environmentally sensitive method, if it would provide control, would be used first and other methods would be used, if control was not accomplished.

- 11-12** See the Planning Overview section in Chapter 1. As discussed in response to comments 4-4 and 10-2, a detailed monitoring plan will be developed prior to implementation of the Proposed Alternative. It will provide guidance for monitoring of resource conditions.

Problem/condition specific monitoring activities will be identified in activity plans developed to resolve resource problems. Monitoring requirements will also be specified in environmental assessment records and project proposals for noxious weed and prairie dog control monitoring guidelines from the noxious weed EIS will also be followed. Implementation priorities will be identified in the record of decision and in the rangeland program summary.



United States Department of the Interior

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225



IN REPLY REFER TO:

L7619 (RMR-PP)

Memorandum

To: Project Manager, Miles City District Office, Bureau of Land Management, Miles City, Montana

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Resource Management Plan/Environmental Impact Statement, South Dakota Resource Area, Miles City District, Bureau of Land Management (BLM) (DES-85/23)

The National Park Service has reviewed the subject draft resource management plan/environmental impact statement (RMP/DEIS) and has the following comments.

The fragmented nature of the lands administered by BLM in South Dakota presents management problems in excess of those to be expected in a state where less than one percent of the land is controlled by BLM. We feel that this DEIS has done an excellent job in recognizing this and proposing a preferred alternative that provides for:

1. Range improvement.
2. Exclusion of livestock from certain riparian areas.
3. Increased forage for wildlife.
4. Disposal (sale or exchange) of up to 30 percent of BLM's acreage (mostly small, isolated tracts) in South Dakota to improve management efficiency.

There are, however, some specific concerns that we would like to see addressed in the final document.

The parcel (no. 8381) of BLM land adjacent to Wind Cave National Park is shown as being managed for grazing. This is a desirable use of the land - a compatible use that the National Park Service would like to see continued.

12-1 Should this parcel be identified as appropriate for sale or exchange, we suggest that language be included in the deed that the land may be used only for grazing or wildlife purposes.

12-2 There was nothing in the DEIS that indicated that the Nationwide Rivers Inventory (NRI) list was checked as required by the Federal Register notice of September 8, 1980 (copy enclosed). The White, Belle Fourche, and Cheyenne Rivers all appear to be potentially affected by actions described in the preferred alternative. The final document should include a determination of effect of the proposed action on the natural, cultural, and recreational values of the three named streams.

12-1 Lands disposed of by BLM will not contain such covenants in their deeds because they are not enforceable.

12-2 All alternatives in this RMP propose improving poor and fair range condition lands in I and M allotments to good or better range condition. The effect would be an improvement in watershed condition, reduce erosion and sedimentation and improved water quality. However, public lands constitute such a small percentage of the watersheds in the White, Belle Fourche, and Cheyenne River systems that improved water quality on public lands alone would have insignificant impacts to those rivers.

If it is found that the proposed action would have an adverse effect on values listed in the NRI (see enclosed materials on South Dakota streams), the final document should determine whether the proposed action could foreclose options to classify any portion of the three named streams as a wild, scenic, or recreational river area. The RMP/EIS should then identify the adverse impacts and give any mitigation or avoidance measures which could be incorporated into the proposed action. Further assistance on NRI procedures may be obtained from Mr. Duane A. Holmes at the address on the letterhead; his telephone numbers are (FTS)776-8705 or (303)236-8705.

We welcomed this opportunity to review the subject DEIS, and look forward to receiving a copy of the final document.

for *Robert B Kayarok*
Richard A. Strait
Enclosures

ARCO Exploration Company
Exploration Operations Western U.S.
707 14th Street
Mailing address P.O. Box 5540
Denver Colorado 80217
Telephone 303 575 1000



July 24, 1985

Mr. Chris Roholt, Project Manager
Miles City District Office
Bureau of Land Management
P. O. Box 940
Miles City, MT 59301

Re: South Dakota Draft Resource Management Plan
and Draft Environmental Impact Statement

Dear Mr. Roholt:

Atlantic Richfield Company appreciates the opportunity to comment on the Proposed Resource Management Plan and Draft Environmental Impact Statement for South Dakota.

On page 45 of the planning document, BLM states that as of 1984 there were 86 producing federal oil wells and 26 producing gas wells in South Dakota. The map on page 46 indicates that virtually the entire State has potential for oil and/or gas reserves. Comments Atlantic Richfield submitted in November 1982 indicated industry interest in the Williston Basin for oil and gas. Since BLM does not intend to change its management direction in relation to oil and gas activities, energy resources were not addressed as a specific issue during the planning process. However, it is our understanding that BLM is tiering its current Oil and Gas Leasing Environmental Assessment into the RMP. As a result, BLM has included several appendices which summarize oil and gas leasing, exploration, and impacts resulting from these activities.

13-1 We recommend that BLM revise Appendix D to provide more specific information with regard to the number of acres available for leasing and under what types of restrictions. For example, how many acres are withdrawn, protected administratively or by statute, require seasonal stipulations and standard stipulations and what is the relationship of these restrictions to oil and gas potential. An example of this type of information which was included in the Custer National Forest Draft Land and Resource Management Plan is attached.

13-2 With regard to Appendix E, Oil and Gas Leasing Program Impact Summary, there is no mention of mitigation or protection measures to lessen these impacts identified. For example, the section on vegetation states that impacts would result from "direct destruction" of plant cover from all phases of oil and gas activities. However, there is no discussion of the fact that it is required by current laws and regulations that vegetation be restored once the activities are completed. Further, there are many methods used to accomplish reclamation and BLM provides industry with guidelines on how site-specific reclamation is to proceed.

ARCO Exploration Company is a Division of Atlantic Richfield Company

13-1 As noted in Appendix D, approximately 7,000 acres have other than standard stipulations. More specific information would be displayed if, as in the Custer Forest Plan, the acreages of various types of stipulations were to vary by alternative.

13-2 The Oil and Gas Environmental Assessment contains an analysis of the impacts of the oil and gas leasing program. A purpose of this analysis was to identify mitigation measures. Appendix E is simply a summary of those impacts. Prefatory remarks have been added to clarify that this is the basis for Appendix E. Discussion in Appendices D and F recognize that those impacts are mitigated. Also, see the response to 13-4.

Mr. Chris Roholt
July 24, 1985
Page 2

13-3 The section on wildlife states that human intrusions into critical winter range or breeding areas during high use periods can have serious impacts on certain species. However, BLM does not qualify this statement by adding that seasonal stipulations are attached to leases in these areas which either prohibit industry activities during these critical time periods or the initiation of any new activities.

13-4 The section on Prehistoric and Historic Features is in particular need of revision. Part of the APD process requires an inventory of cultural resources before activities begin. The reason for this requirement is to avoid the destruction of valuable artifacts or cultural sites. BLM is responsible for examining the inventory or conducting one of its own prior to oil and gas activities. This is even stated in Appendix F. Therefore, there should be little or no destruction of artifacts or sites without the consent of BLM. In any event, most companies will halt activities should they stumble upon a cultural resource site or artifacts and consult with BLM.

In general, we strongly recommend that BLM expand the discussion of impacts in Appendix E to include voluntary and required measures implemented to avoid or minimize impacts associated with oil and gas activities. Additionally, we urge BLM to consider combining Appendices E and F in an effort to present the realities of the situation. Each stipulation could be included under the appropriate heading in Appendix E.

In conclusion, I appreciate the time you took to explain BLM's position. Our conversation helped me to understand why energy resources were not included in the plan as an issue. Nevertheless, I believe that the recommendations presented in these comments would provide a better mineral basis in the plan making it more defensible. If you would like to discuss these views in more detail, please don't hesitate to call.

Sincerely,


C. M. Moseley
Public Lands Analyst

Attachment

13-3 Environmental consequences discussed in Chapter 4 reflect potential impacts to cultural resources from implementation of the RMP alternatives. Therefore, the Chapter 4 discussion relates to the RMP issues, vegetation apportionment and lands. BLM's responsibilities for the management of cultural resources in relationship to all proposed surface disturbing activities, including oil and gas, are discussed under "Other Resource Programs". Stipulations to oil and gas leases regarding cultural resources are covered in Appendix F.

13-4 Appendix D has been rewritten to show that mitigation stipulations occur during each of the stages of leasing, exploration, and development. Please note that the document has been changed to clarify the basis of Appendix E.



July 22, 1985

Mr. Billy McJvain
Area Manager - Bureau of Land Management
South Dakota Resource Area
510 Roundup Street
Belle Fourche, South Dakota 57717

Dear Mr. McJvain:

The following comments regarding the Draft Resource Management Plan for the South Dakota Resource Area are offered on behalf of the Minerals Exploration Coalition (MEC). The MEC is an organization comprised of over twenty hardrock minerals exploration companies and other individuals who, among other things, monitor and comment on activities that may affect mineral exploration and development.

Our comments regarding the plan pertain only to issues related to hardrock minerals management. We realize that over the greater portion of the South Dakota Resource Area, hardrock minerals are not an issue. With those caveats in mind, our comments are as follows:

14-1

- 1) We support the BLM's preferred alternative including disposal or exchange of isolated tracts and the consolidation of lands.
- 2) We support the BLM's efforts to continue to manage lands actively utilizing the multiple use concept and the recognition and reiteration of the national policy of encouragement to explore and develop minerals in a sound manner.

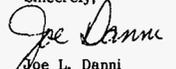
It becomes apparent when reviewing the Plan's maps that if ever a sound argument for the BLM, and Forest Service interchange proposal existed, it is in the South Dakota Resource Area. We realize this issue is outside the purview of the Resource Management Plan. However, BLM lands in the Lead-Deadwood area and southern Black Hills should logically be put under Forest Service control. Just as logically, isolated parcels of the Custer National Forest should be turned over to the BLM. Such transfers would meet the stated goals of the interchange as well as assist both agencies in their future planning processes.

14-1 Your comments have been considered in the preparation of the final and no changes were made in the document.

Mr. Billy McIlvain
July 22, 1985
Page 2

We appreciate the opportunity to comment.

Sincerely,


Joe L. Danni
Regional Manager
Government Affairs

JLD:po

cc: Debie Montoro - Minerals Exploration Coalition



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
WGS-Mail Stop 423

JUL 3 1982



Memorandum

To: Chris Roholt, Project Manager, Miles City District Office,
Bureau of Land Management, Miles City, Montana

From: Assistant Director for Engineering Geology

Subject: Review of draft resource management plan and environmental statement
for the South Dakota Resource Area, South Dakota

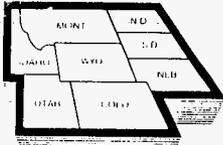
We have reviewed the statement as requested in a letter received April 16
from the State Director, Bureau of Land Management.

- 15-1** The plan should indicate whether an oil spill emergency plan is required before an oil test well is drilled or an oil well is placed in production. Oil
- 15-2** well abandonment requirements should include proper sealing and plugging to protect aquifers. The use of ground water in the widely distributed lands
- 15-3** under BLM's management should be addressed more adequately.


James F. Devine

Copy to: District Chief, WRD, Huron
(information only)

- 15-1** Based on CDM 642.3, the BLM may determine whether a spill contingency plan is required. It can be required for one well or facility or for a field. API standards, which are designed to prevent or control spills, apply to all drilling and production facilities and activities.
- 15-2** Our stipulations address reclamation. Plugging procedures must be submitted to the BLM and approved by the BLM prior to plugging.
- 15-3** There are only five water wells on public lands in South Dakota. Since none of the RMP's alternatives will have significant impacts on groundwater, it was discussed only briefly in Chapter 3.



**Rocky Mountain
Oil & Gas Association, Inc.**

South Dakota Resource Area *Chis*
AM 6 Adm _____ Alice I. Frell
Range _____ File Lands Director
AUG 5 1985 *1608*
SD RMP
Form _____
Fr. Techs _____
Lands 16 S. Pro _____

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261



July 26, 1985

Mr. Billy McIlvain
Area Manager
South Dakota Resource Area
Bureau of Land Management
510 Roundup Street
Belle Fourche, SD 57717

Dear Mr. McIlvain:

I am writing on behalf of the Rocky Mountain Oil and Gas Association (RMOGA) to comment on the South Dakota Resource Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS). RMOGA is a trade association representing hundreds of large and small oil companies who account for more than 90% of the oil and gas exploration and production activities in the eight state region we serve. Because so much of the land in these states is owned by the Federal Government, land management planning is of vital interest to our members, especially with regard to minerals development.

It is our understanding that the BLM does not intend to change the management direction of the Resource Area with regard to oil and gas activity, and therefore, energy and minerals have not been addressed as a specific issue in the RMP. We concur with this decision and the BLM's inclusion of mineral resources in the Appendices to the plan; however, we do have several suggestions which we would like to see embodied in the final plan.

- 16-1** First, we recommend that the BLM incorporate the Fluid Mineral Leasing Guidelines into the tradeoff decisions being made for the Resource Area. We believe it is important to be able to analyze the effects of each alternative on the ability of industry to explore for and develop mineral resources, and the Guidelines provide planners with effective, illustrative reasons for management decisions. Additionally, we suggest combining the Appendices into one document,
- 16-2**

16-1 See response to 13-1.

16-2 See response to 13-2.

July 26, 1985

Mr. Billy McIlvain
Area Manager
South Dakota Resource Area
Bureau of Land Management

page two

thereby enabling the reader to more easily compare resource tradeoffs being made in each alternative. By utilizing the Guidelines, we believe the BLM will have a more understandable and acceptable plan.

16-3 Further, we take exception to several statements contained in Appendix E, which discusses the impacts of intrusions by humans, referring to the destruction of plant cover, wildlife habitat, and cultural resources. The BLM does not go on to qualify these remarks, and we would suggest outlining the stipulations and mitigation measures imposed on oil and gas operators which more than adequately protect environmental and wildlife values. Operators are not only required to complete cultural resource inventories prior to conducting activities, but are allowed to conduct operations only in conjunction with careful environmental mitigation measures. In addition, operators are always required to reclaim all areas which have been disturbed, and have done so with great success.

Thank you for the opportunity to comment. We will be happy to answer any questions you may have.

Sincerely,


Alice I. Frell
Public Lands Director

AIF:cw

16-3 See response to 13-2 and 13-4.



STATE OF SOUTH DAKOTA

EXECUTIVE OFFICE

WILLIAM J. JANKLOW
GOVERNOR

August 12, 1985

Chris Roholt, Project Manager
Miles City District Office
Bureau of Land Management
Post Office Box 940
Miles City, Montana 59301

RE: Draft Resource Management Plan, South Dakota Resource Area,
Miles City District

Dear Chris:

As a result of a meeting between various South Dakota state agencies and the Bureau of Land Management in April 1985, the State of South Dakota is offering the following comments on the Draft Resource Management Plan for the South Dakota Resource Area.

- 17-1
1. The Draft Plan suggests that 77.3% of the land suitable for grazing is in good or excellent condition. The table on page 8 also indicates that of all the public land administered by BLM that 68.4% of the land is in good or excellent condition. This appears to be an overly optimistic appraisal of the land as it is difficult to believe that over three-quarters of the BLM land is in good to excellent condition.

Part of the problem is BLM's criteria for rating land. The state does recognize that the land is rated on a comparative scale based on the quality of that land now compared to the best possible condition that land could be in. On that basis, the figures may be reasonably accurate, however, none of the criteria for assessment or rating is explained in the Resource Management Plan. The standard of review used by BLM should be shared with the reader of the Resource Management Plan, as well as the affected state agencies in South Dakota state government. At a minimum, this requires detailed explanation in the Resource Management Plan and perhaps an opportunity for state agency personnel to tour specific land sites with BLM staff.
 2. The State of South Dakota approves the preferred change in grazing management, range improvement, and mechanical treatment to improve slightly over 31,000 acres. Philosophically, the state approves the conversion of acreage from range to tame grasses, but cautions BLM on

17-1 See response to 4-1. You are welcome to tour any areas of interest with BLM personnel.

17-2

the conversion until all consequences are considered. What may be good for one species (i.e., livestock) may not be good for another (i.e., wildlife). Such conversion of native pasture to tame grasses should be explained in more detail, including the type of grass which BLM would intend to introduce, and why.

17-3

3. BLM has identified 1,331 acres of riparian vegetation for protection, but does not clarify whether this is the total riparian vegetation in the area. The deterioration of riparian areas is prevalent, particularly the woody vegetation. One only needs to drive through western South Dakota to observe that few young trees have a chance to start and most of the old ones are dying. However, it may not be in the best interest of the land to completely exclude these riparian areas. Alternate grazing periods during low intensity grazing seasons, such as winter, may be more appropriate.

4. The state agrees with BLM's decision to defer grazing on fragile soils in the wet season.

17-4

5. Since the methodology of assessing land is not explained sufficiently, BLM should be cautioned about increasing animal unit months (AUM's) until those lands targeted are brought up to an excellent condition or at least the upper reaches of the high category. The increase in AUM's is generally beneficial to livestock and frequently beneficial to wildlife, although that conclusion must be reached on a case by case basis.

17-5

6. The potential for competition between wildlife and livestock interests exists in any resource management plan. This Resource Management Plan seems to favor livestock interests, while wildlife habitat management discussion is superficial. The arbitrary introduction of tame pasture into native pasture areas may or may not be advantageous and again those decision should be made on a case by case basis, and explained pursuant to comment number two.

17-6

7. Substantial tracts of land, up to 170,000 acres, could be categorized for disposal by BLM either for sale or trade. However, the state would caution BLM to represent fairly the difference in grazing fees charged by BLM, the Department of School and Public Lands, and private land-owners. Since private rates exceed government rates, and BLM rates are even lower, an explanation of the purpose for which each type of land is managed may eliminate much controversy.

17-7

8. The listing of state representatives, senators, and officials on page 78 of the Resource Management Plan needs to be updated.

17-8

9. The Environmental Consequence section contains an economic analysis of all the management activities. The analysis points out that state land acquired by BLM in the land exchange is not eligible for payment in lieu of taxes (PILT). The State of South Dakota is working with the federal government to reverse this position, and if this is still the case the plan should be revised and discuss this potential option.

17-2

See response to 5-1. Types of grass to be introduced in tame pasture conversions would generally be cool season spring grasses with nitrogen fixing forbs. Also, see the response to 5-1.

17-3

See response to 4-3.

17-4

See response to 8-3.

17-5

See response to 5-1.

17-6

This plan proposes a maximum of 85,000 acres for disposal, not 170,000 acres as stated in the letter. Discussion of the impacts of sale or exchanges on the lessee is found in Chapter 4 under each alternative in Economics.

17-7

The list has been updated, in response to your comments.

17-8

An activity plan, such as a lands report environmental assessment, will be prepared for any proposed land exchange. If the PILT situation has changed, then it will be reflected in any such assessment for State-BLM exchanges.

Chris Roholt, Project Manager
August 12, 1985
PAGE 3

This concludes the state's comments on the Resource Management Plan, and we are pleased that the Bureau of Land Management provided the state this opportunity. If further comments or clarification of the above comments are needed, please feel free to contact me.

Sincerely,



Dana Nelson
Executive Policy Aide
STATE GOVERNMENT OPERATIONS

DN:jrr

LIST OF PREPARERS

The following people prepared the RMP:

Steering Committee

Robert Teegarden, Chairman. BS Natural Sciences, Montana State University. He provided District policy and oversight to the RMP project. He has been with the BLM for 24 years.

Jim Beaver, MSO Coordinator. BS Wildlife Management, Humboldt State University. He represented the Montana State Office and provided headquarters policy, oversight and coordination to the RMP project. He has been with the BLM for 12 years.

Billy McIlvain, South Dakota Resource Area Manager. BS Agronomy, Texas Tech University; MS Range, University of Idaho. He provided Resource Area policy and oversight to the RMP project. He has been with the BLM for 23 years.

Project Team

Chris Roholt, Project Manager. BS Mathematics and Economics, MS Forestry/Economics, University of Montana. He was responsible for the overall development and coordination of the RMP project and also served as team leader. He has been with BLM for seven years.

Amy Fraley, Technical Coordinator (through November, 1984). BS Resource Management, University of Wisconsin at Stevens Point. She was responsible for the coordination of schedules and accuracy of technical information. She was also responsible for coordinating with MSO on graphic displays in the document. She has been with BLM for five years.

Judith Bartley, Technical Coordinator. BS Forestry, MS Recreation/Land Use Planning, University of Missouri at Columbia. She was responsible for the coordination of schedules and accuracy of technical information. She also was responsible for coordinating with MSO on graphic displays in the document. She wrote the social assessment portion of the RMP. She has been with BLM for two years.

Leon Pack, Vegetation Apportionment Issue Leader. BS Life Science Education, MS Wildlife Biology, Utah State University. He wrote the range portion. He has been with BLM for 11 years.

Chuck Berdan, Lands Issue Leader. Associate Degree of Applied Science Natural Resource Management, University of Minnesota at Crookston; BS Wildlife and Fisheries, South Dakota State University. He wrote the lands portion. He has been with BLM for eight years.

William Volk, Soil Scientist. BS Agriculture Production, MS Soils, Montana State University. He prepared the soils section and assisted with the watershed and range portions. He has been with BLM for seven years.

Joe Frazier, Hydrologist. BS Business Administration, University of Kansas; MS Aquatic Biology, Emporia State University; MS Hydrology, University of Wyoming. He prepared the hydrology portion. He has been with BLM for five years.

Dale Tribby, Natural Resource Specialist. BS Wildlife Management and Biology, South Dakota State University. He assisted in preparation of the range portion and wrote the wildlife section. He has been with BLM for seven years.

Jerry Clark, Archaeologist. BA Anthropology, University of Montana; MA Anthropology, Washington State University. He prepared the cultural resource section and has been with BLM for ten years.

Ron Wickline, Natural Resource Specialist. BS Forestry and Soils, University of Montana. He wrote the forestry portion and has been with BLM for five years.

Dennis Bucher, Forestry Technician. BS Biology, Black Hills State College. He assisted in the preparation of the forestry portion by providing photo interpretation, overlays and other information. He was been with BLM for six years.

Dale Hanson, Range Conservationist. BS Wildlife Science, New Mexico State University. He wrote the paleontologic portions and has been with BLM for eight years.

Ken Hanify, Natural Resource Specialist. BS Science and Industrial Arts, South Dakota State University; MA Biology, Northern Arizona University. He wrote the section on recreation. He has been with the BLM for seven years.

Jim Gruber, Geologist. BS Geology, California State University at Chico. He wrote the Management Situation Analysis on minerals and contributed to the minerals section of the RMP. He has been with BLM for two years.

Dave Peters, Regional Economist. BA Economics/Business Administration, Chapman College. He wrote the economics sections. He has been with the BLM for 11 years.

James Hetzer, Writer/Editor. BA Journalism, University of Colorado. He wrote portions and edited the RMP. He has been with BLM for six years.

Rebecca Holzheimer, Cartographic Technician. Graduated Simms (MT) High School. She prepared the allotment overlay for the RMP. She has been with BLM for six years.

Barbara Hamburg, Word Processor Operator. Graduated Savage (MT) High School and Modern Business College, Missoula, Montana. She was responsible for the copy word processing. She has been with BLM for three years.

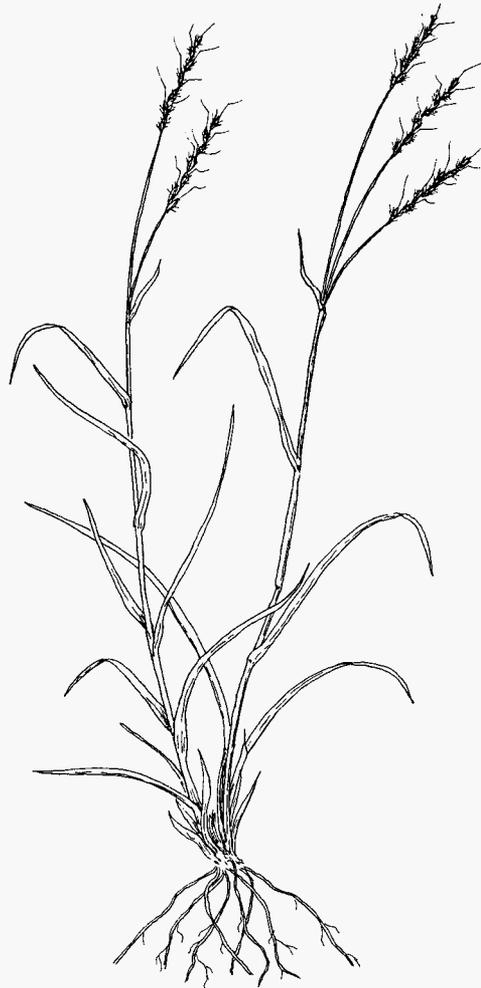
District Review

The Miles City District Division of Lands and Renewable Resources and the Planning and Environmental Assistance staff provided technical review of the RMP.

Montana State Office Support

The Division of Lands and Renewable Resources and the Division of Mineral Resources staffs provided assistance in preparation and review of the RMP during development.

The Printing and Graphics Section provided mapping, art, typesetting and printing support.



Little Bluestem