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First name: Jan
Last name: Swenson, ED
Organization: Badlands Conservation Alliance
Title:
Comments: Badlands Conservation Alliance (BCA) thanks you for the opportunity to submit comments on the Northern Great Plains Management Plan Revision, Draft Supplemental Environmental Impact Statement for Oil and Gas Leasing. As you know, BCA has repeatedly over the last decade sought a comprehensive analysis and planning process for oil and gas development on the Little Missouri National Grassland (LMNG) to address unprecedented scope, scale and pace of industry activity with the onset of the Bakken oil boom and the state of North Dakota's ongoing promotion of additional formations with production potential.

Range of Alternatives Not Adequate

Arrival at this stage of the process, albeit too slow and long in its undertaking, is appreciated. Collaborative efforts of Dakota Prairie Grasslands employees and the Forest Service Enterprise Program are noted and while many of our previous questions have been analyzed, we are not satisfied with the range of alternatives offered. Considering the magnitude of potential development and the significance of this belated opportunity to address impacts, we find the alternatives as outlined in the Draft SEIS without adequate relief.

In introducing the Draft SEIS at the Dickinson, ND open house on December 13, 2018, Enterprise Program team leader Shannon Downey characterized the preferred alternative as having "minor" changes to current management. We agree, and find this contrary to the expectations of a process of this significance for the future integrity of the Little Missouri National Grassland.

It was confirmed that No Surface Occupancy stipulations for roadless areas, rather than attached lease notice of same, does not in reality increase acreage in that category. Instead it clarifies the Roadless Area Conservation Rule, an existing and proven law of the nation.

Additional Alternative Proposed

While it would be justified for a conservation organization to simply advocate for the no further leasing alternative, BCA has always sought a comprehensive planning process that met the greatest good for the ecological resource while providing for a range of Grasslands uses. We hold that at least one further alternative available to the decision-making process is available and merits further study; that more in-depth consideration of the benefits and impacts of selective withdrawal of mineral availability for both unleased and expiring leases must be pursued.

Regardless of the Forest Service focus only on federal minerals underlying federal surface, in the real and practicable world, we all know that the intermingled ownership prevalent in the Little Missouri National Grassland is interconnected, thus impacting multiple interests and users, including agriculture, wildlife, recreation, extractive industry, etc. This may be the last best time to make wise decisions if we want the future of the Grassland to have any chance of maintaining a glimpse of its substantial traditional past values while allowing for reclamation down the road when the oil and gas industry is either done with it or passes into obsolescence.

BCA would recommend that the USFS start by referencing multiple areas, landmarks, and or landscapes including:

Existing Suitable for Wilderness

Existing Backcountry Recreational Non-Motorized

Existing and nominated Special Interest Areas and Research Natural Areas Areas with High Scenic Integrity goals

Riparian areas Lakeshore

Proximity to the three units of Theodore Roosevelt National Park (TRNP)

ND Industrial Commission Areas of Interest lands, but including both public and associated private surface ownership

While this list may not be inclusive, it is representative and gives the Forest Service a place to start in analyzing potential for selective withdrawal of authorization to lease. To further exemplify our intention, a look at the map on page 17 of the DSEIS (Figure 4. Alternative 3) readily identifies areas where potential for withdrawal would hold significant benefit:

Johns Town/Horse Creek

Acreage abutting the North Unit of Theodore Roosevelt National Park (TRNP) Wannagan and Twin Buttes Tracy Mountain

Both sides of the Little Missouri River between Bullion Butte and Kendley Plateau Strom Hanson

Again, the lists above are in no way inclusive of all areas that should be considered in an alternative for selective lease authorization withdrawal as they do not represent those currently leased acreages that are likely to reach expiration. All non-producing, suspended, and potentially expired leases as identified on page 24 of the DSEIS (Figure 6) should be further defined by date and additionally considered for withdrawal, especially as associated with the areas outlined. Such information should be available to the interested public.

BCA finds the preferred alternative a wholly inadequate suggested action given the extent of industrial development within and surrounding the boundaries of the Little Missouri Grasslands. However, we have monitored development within Grassland boundaries closely over the last decade and find the no further leasing alternative does not satisfy the comprehensive planning that is ultimately our goal.

There are also unintended consequences of the no leasing alternative that could prove detrimental:

[middot] Industry's tendency to site development on private surface to avoid USFS regulation, regardless of private landowner preference and without consideration for the integrity of the larger landscape, would continue and perhaps be exacerbated.

[middot] Development of areas on the edge of being economic could occur unnecessarily and for political reasons.

[middot] The lifetime of poorly producing wells may be extended and the number of temporarily abandoned and plugged but not reclaimed sites could expand.

[middot] Simply not leasing has the potential to push surface development onto sites that further impact special places.

[middot] No leasing may limit the opportunity for mineral exchange now and into the future.

We want to state in writing as confirmed by Forest Service personnel at the Dickinson open house that all leasing, including that of expiring, suspended or unleased minerals, will not be available during this planning process. Furthermore, we wish it clarified as to similar status of federally owned minerals under private surface. Without such confirmation, this entire process becomes a sales catalog for the oil and gas industry.

Additionally, BCA holds that Bureau of Land Management (BLM) minerals under private surface should be given equal consideration for withdrawal as those addressed in the DSEIS and that the Forest Service should be working in advisement with its cooperating agency, the BLM, to identify such potential withdrawals.

BCA Investment in the Project Process

BCA is deeply invested in this project. Well prior to the initial Notice of Intent for a Dakota Prairie Grasslands Oil and Gas Development Supplemental Environmental Impact Statement published in the Federal Register on December 19, 2012, BCA had been advocating for review and update of the Reasonably Foreseeable Development Scenario and comprehensive planning for oil and gas development in the state of North Dakota and particularly the Little Missouri National Grassland.

Despite the absence of an official scoping period at that time, BCA was integral in the organization of conservation community efforts to expand the December 2012 NOI. Meetings were held with both Dakota Prairie Grasslands and Regional leadership, and a letter signed by 12 unique organizations and individuals, which laid out our concerns and recommendations, was sent to then Northern Region Acting Regional Forester David Schmid in March of 2015. A new and expanded NOI was published in the Federal Register on September 21, 2015.

While referencing the "new information and changed circumstances" influencing the need for this project, nowhere does the specific, stand alone "Bakken" appear. BCA suggests that since it has now been 17 years since the last official environmental review, the Forest Service should be incorporating all existing industrial development in weighing oil and gas impacts in the Little Missouri National Grasslands, and that includes the oil and gas industry associated potential for mining of sand for fracking proppants, as well as current interest in rare earth mining. Considering the length of time it has taken to get to this point in the process and North Dakota's political/economic climate, all potentially transformative issues and users of the resource should be included in analysis.

As stated in the ND Geological Survey's January 2017 publication of Geo News:

North Dakota has experienced commercial oil and gas production from 19 different geologic formations over the past 65 years. Most of these productive formations have experienced spotlight attention from the oil and gas industry at one time or another, and, whether for a few months or years, were considered a "hot play" to explore and develop. The unconventional Bakken-Three Forks development is a current example of a play that brought oil and gas activity in the state to record levels and has sustained drilling activity even in a depressed oil and gas market. As the oil and gas industry transitions beyond the Bakken over time and begins to spend more time evaluating the other 17 productive non- Bakken/Three Forks Formations, additional oil and gas plays will emerge across western North Dakota.

(https://www.dmr.nd.gov/ndgs/documents/newsletter/2017Winter/Oil%20and%20Gas%20Potential%20of%20the%20Red%20River%20Formation,%20Southwestern%20North%20Dakota.pdf)

See also the latest January 2019 issue of Geo News for further information on proppants and rare earth mining. (https://www.dmr.nd.gov/ndgs/newsletter/2019Winter.asp)

Reasonably Foreseeable Development Scenario (RFDS)

An RFDS is a prediction and only as good as the information and premises on which it is based. BCA finds that the RFDS Updates dated 8-28-2017 fail to consider important aspects of ongoing and future oil and gas development in the Little Missouri National Grassland and therein underestimate future activity.

[middot] First, the difference in length of lease terms on federal vs. private and state minerals colors the information offered in Table 1 on page 2 of the Updated RFDS. Industry's operational planning follows their need to protect their own economic interests and avoid lease expiration and costly re-negotiation.

[middot] Only one producing well is required to hold a lease. Once held, industry is free to follow the larger dollar, which is not necessarily federal surface over federal minerals.

[middot] Industry will routinely drill adjacent private surface to avoid stricter federal regulation and the lengthier timeframe involved in federal permitting.

[middot] At such time as industry returns to a given held lease, infill wells are often batch-drilled resulting in significantly larger numbers than reflected here.

[middot] Fluctuating prices have driven industry to concentrate on core areas. A good deal of the Little Missouri National Grassland is not in the Bakken core area. As the core is fully developed, industry is expected to move more readily throughout the Grassland. Recent changes to the ND Industrial Commission's gas capture policy (April 2018) specifically encourage development in townships outside the core area.

BCA holds that the August 2017 updates to the RFDS do not adequately reflect the practicable realities of future oil and gas development on the Little Missouri National Grassland.

US Forest Service and Council of Environmental Quality Policy Page 22 of the DSEIS:

Forest Service policy (Forest Service Manual 2820) states that the agency considers mineral exploration and development to be important parts of its management program. It recognizes that mineral exploration and development are ordinarily in the public interest and can be compatible in the long term, if not immediately, with the purposes for which the National Forest System lands are managed. This policy and the statutory responsibility given to the Forest Service and the BLM drive the purpose for oil and gas development. (Bold is BCA's.)

In a different time BCA would likely have agreed with this statement. However, as impacts locally, nationally and globally are seen ever more frequently to coincide with the science of global climate change, we hold this is no "ordinary" time in the life of fossil fuel development. Long term public interest calls for constrained oil and gas development. Furthermore, review of the DSEIS analysis suggests that "the purposes for which the National Forest System land are managed" are at risk long term, not only as the result of impacts due to oil and gas development itself, but quite possibly changes in the economics of the industry into the future that will hamper full reclamation, leaving us with a degraded Grassland.

Perhaps more succinctly, page 132 of the DSEIS states:

The Council on Environmental Quality regulations require consideration of "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity" (40 CFR 1502.16). As declared by the Congress, this includes using all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans (National Environmental Policy Act, section

101). (Bold is BCA's.)

BCA's comments above apply also to the directives here of the CEQ. We would add:

The Little Missouri National Grassland is the largest designated National Grassland in the United States and represents one of the best examples of intact native mixed-grass prairie in the United States. (Bold is BCA's.) It is the opening sentence of the Abstract from: Butler, J.L., J.P. Ott, C. Hartway, B.E. Dickerson. 2017. Biological Assessment of Oil and Gas Development on the Little Missouri National Grassland. Final Report. Rocky Mountain Research Station Forest and Grassland Research Laboratory Rapid City, South Dakota specifically for the Little Missouri National Grasslands, Bismarck, North Dakota as cited in the DSEIS References on page140.

The document goes on to acknowledge: Bill O'Donnell, John Kinney, and Karen Dunlap of the Dakota Prairie provided helpful guidance that is much appreciated. It is a not overly optimistic look at what we know and do not know about impacts of oil and gas development on the Little Missouri National Grassland, and verifies that we should be taking a very cautionary approach, especially for those "future generations of Americans."

Staffing at the Dakota Prairie Grasslands and Impacting the Little Missouri National Grassland Sometime between 2006 and 2008 is generally considered the beginning of the Bakken Boom in North Dakota. Yet, it was not until 2012 that the first NOI was published in the Federal Register for this project, revised in 2015, with the release of the DSEIS in November of 2018. That is a long time in the making; a time during which oil and gas development created large scale frenzy and chaos, went nearly bust, and rose again to what it is today.

In many ways, this DSEIS is too late, but it is what we have. Therein, all involved must do the very best we can in making it a worthwhile exercise.

It must be noted in BCA's comments that staffing inadequacies across the Dakota Prairie Grasslands and particularly in the Ranger Districts most impacted by oil and gas development, have played a significant role in this tragically delayed action. Not only are offices short staffed, but experienced employees are often wooed away by industry, creating an ever swinging door.

While better and more sincere prioritization could and should have been followed, we are not simply pointing fingers here. Our larger concern, and it is a dramatically overarching concern, is for the future. Throughout the DSEIS it is noted that vigilance required by Forest Service to siting, monitoring, inspection, continued research and investigation, law enforcement, reclamation, etc. are essential for recovery from the impacts and disturbance of oil and gas development. Staff hours and adequate funding will be essential. Considering the range of directions the energy industry may take over the upcoming years and decades, there is a substantial risk that the Little Missouri National Grassland will be left holding the bag for proper reclamation and restoration.

The Forest Service, at the local, regional and national level, has a responsibility to realistically gage its proposed actions and decision-making based on not one single user's interest, but on the larger value of the Little Missouri National Grassland as a unique national resource for the benefit of and under the ownership of all - including those previously cited future generations. Oil and gas development must not exceed USFS staffing capabilities. If that be the no leasing alternative, so be it.

Leadership and Comprehensive Planning

While most of the issues BCA has brought forward in previous communications were included in the DSEIS analysis, the Preferred Alternative does not begin to address our concerns. As a leasing decision, the Forest Service claims the decision made here will have "no direct effects on the environment" and that indirect effects will be addressed "when the lessee decides to develop the parcel and submits an application for a permit to drill." This may be technically correct, but it is a weak argument if one is genuinely seeking to achieve some kind of big

picture planning for protection of the Little Missouri National Grassland and its many values and resources.

Having persistently monitored oil and gas activity in the Little Missouri National Grasslands and surrounding areas over the last decade and a half, it is clear that leasing decisions are key to better management. All too often state and federal entities claim they are without authority to do a better, or even adequate, job of managing development impacts because leasing decisions have already been made and tied their hands.

Repeatedly within the DSEIS, the Forest Service dismisses the ability and opportunity to truly make a difference for the future of the Badlands. Yes, the intermingling of private, state and federal surface and split estate issues complicates things; and yes, there are areas of concern such as excessive flaring that may be under the authority of State or other federal entities; but to claim you therein have no skin in the game is negligent. The land within the administrative boundaries of the Little Missouri National Grassland is a neighborhood - dependent economically, socially, ecologically on each other and the larger whole.

As the neighbor holding a majority interest in surface ownership, the Forest Service has an obligation to take a leadership position which will protect itself by advocating for best practices across the whole. Therein, deeper analysis must be done PRIOR to any leasing decision.

Additional BCA Focus

Given the interest and uses of BCA membership on the Little Missouri National Grassland, one might assume our concerns are largely recreation and wildlife related, but this is not necessarily true. BCA's abbreviated mission statement filed annually with the ND Secretary of State claims "restoration and preservation of the ecological integrity of western North Dakota's public lands." And it is to that end we make the following comments.

Scenic Resourcesplay a role that goes beyond what is pretty and they also serve as one of the top illustrations of the level of disturbance across the Grassland landscape. BCA finds that this section of the DSEIS makes incorrect assumptions.

On page 120 of the DSEIS, it is stated:The scenic integrity objectives assigned high or moderate in the area of the proposed National Forest System lease parcels are less than 32 percent of the total area, which indicates that scenic integrity is of moderate priority for resource management consideration in compared to other management needs.

This exemplifies one of the problems of using outside staffing resources such as the Forest Service Enterprise Program as preparers of a document such as this DSEIS. It also illustrates the consequences resulting from the frequent turnover that characterizes Dakota Prairie Grasslands staffing. For those of us that participated in the NEPA process that resulted in signing of the Land and Resource Management Plan for the Dakota Prairie Grasslands, we are aware that "scenic integrity" at that time was not an issue in the same way that it is today. One could have stood on a butte top across much of the Grassland without seeing any sign of human activity except livestock fences and the occasional ranch site or stock pond. The boundaries of Theodore Roosevelt National Park itself were visually undefined. To assume that that 32% high or moderate Scenic Integrity Objective reflects an actual desired condition is a skewed assumption.

Similarly, the Incomplete and Unavailable Information (1-the absence of any usable Scenic Attractiveness data or mapping, and 2-the absence of GIS Data for viewing platform information or listings of routes and sites of concerns) cited on page 16 of the Scenic Resources Report may be inexcusable but is also aptly reflective of the degree to which disturbance to scenic vistas and integrity was a moot point, largely irrelevant and non- existent at that time.

Additionally, BCA finds no support for the conclusion made on page 126 of the DSEIS: Under the reasonably

foreseeable development scenario, exploratory drill rigs would likely be visible from the trails in foreground, middleground and background, which could reduce the quality of the scenic experience for individuals visiting the trails. Depending on the level of development, this could be considered incompatible with the purpose for which the trails were established. While views of oil and gas development might reduce the quality of the experience for some trail users, it would probably not displace users.

It is the "probably not displace users" that we find fault with. Rather, we find that users of a wide variety, including recreationists, hunters, and of particular concern, ranchers, have great potential to be displaced. National Visitor Use Monitoring has not been adequate to make such a statement. In fact, visitation figures specifically for the Little Missouri National Grassland are unavailable (DSEIS, page 103). The many anecdotal reports of previous visitors that no longer see the Grasslands as a chosen destination for hunting or recreation ("guess we'll have to find somewhere else to go") or approach visiting BCA members with local ND license plates to complain or despair over state and federal laxity for protections of "their" public lands are contrary to the conclusion here.

Flaringof produced gas is discussed, but dismissed as under the authority of the ND Department of Health, Industrial Commission and the EPA. BCA finds this a weak position considering the range of impacts to the Grassland. Air quality is not the singular issue at stake. Disturbance to wildlife, dramatic and avoidable impacts on scenic integrity, waste of a federal natural resource with economic consequences, public health and safety are all additional aspects of USFS management that could and should be used to limit or deny flaring on public lands.

We would also point out that the most current ND Department of Mineral Resources data quoted in the DSEIS (page 49) is from June of 2017. The volume of natural gas produced and flared has increased dramatically since that time, with gas capture goals not being met and flared gas volumes nearly two and a half times that reported in June 2017 (https://www.dmr.nd.gov/oilgas/directorscut/directorscut-2018-12-14..pdf). In April of 2018 the DIC further relaxed their flaring policy in favor of industry and to promote expanded development, gas gathering capacity is currently inadequate and likely to remain so despite projected infrastructure improvements, and the NDIC continues to manage by incentive rather than rule of regulation.

On page 50 of the DSEIS it is stated:

These large fluctuations in flared gas volume creates uncertainty in making greenhouse gas emissions estimates from oil production sources and need to be taken into account when considering the amounts of greenhouse gases the oil industry is emitting in North Dakota.

And, the uncertainty points to limiting available lease parcels.

DSEIS discussion on hydraulic fracturinghighlights emissions that are of public health concern and goes so far as to add a stipulation for developed recreation sites. We have two comments here.

On page 45 of the DSEIS it states: Based on this analysis, estimated buffer distances ranged from 470 to 532 meters. These distances could be used to inform a fenceline buffer in order to mitigate potential public exposure to nitrogen dioxide and associated potential impacts.

While the stipulation for recreation sites does provide timing limitations and a quarter-mile buffer for scales 3 through 5 (existing and future), this provides no level of protection for livestock, wildlife, hunters, ranchers or dispersed recreationalists. We might assume that living things would avoid fracking operations, but that is certainly not true in all cases. Curiosity actually can be a draw in some cases.

Further education of the public is required regarding these findings and we cite this as one more cause of "user displacement" by oil and gas development.

As an aside, NDCC 38-08-05 allows for well locations to be sited as close as 500 feet from an occupied dwelling (https://www.legis.nd.gov/cencode/t38c08.pdf). BCA holds that the US Forest Service has an obligation to share their fracking emission analysis with appropriate North Dakota governmental departments and with the State Legislature currently in session.

BCA finds the DSEIS analysis associated with climate changemerely perfunctory. Emissions and public costs from the end-use of oil and gas produced on the Little Missouri National Grassland should be analyzed and best estimates disclosed as such information should certainly impact this leasing decision.

In addition, analysis should be pursued and shared as to the impacts on other national public lands where North Dakota's wasting of flared natural gas promotes development elsewhere.

While BCA bemoans the overall disturbance and loss that oil and gas development at the current scale and that projected into the future, perhaps our greatest concerns lie with the threat of long term impacts whose reclamationand recovery remain undefined and in question - those surrounding the basic forces of life in the hydrology, soil health and vegetative statusof the Little Missouri National Grassland.

These three are integrally tied together in ways and depths that even our best science does not yet know. And, we are risking the Little Missouri National Grassland by experimenting with its bounds and its ability to recover.

Because roads, pipelines and transmission lines do not have the stipulations that govern siting of well pads and related infrastructure, the disturbance created during both construction and use can serve as inroads for degradation, especially as impacts hydrology, soil and vegetation. Surface ownership boundaries do not apply and therein reinforce BCA's advocacy for the USFS to take a leadership position for support of comprehensive planning.

While the USFS does not allow for withdrawal of surface water for use in drilling or hydraulic fracking, the State does. Surely what happens on neighboring surface property, affects the federal lands and waters downstream.

Changes in drainage patterns, sediment loads and spills will all impact hydrology, soils and vegetation in a landscape where more than half of the streams are already properly functioning but at risk or assessed at not properly functioning (DSEIS, page 58). Depending on the density of roads constructed and their proximity to streams, effects to water quality from sediment runoff will likely range from negligible to major (DSEIS, page 60). In some cases, reclamation may be difficult to accomplish, and it may take many decades for hydrologic recovery at a site (DSEIS, page 60).

On page 93 of the DSEIS it is stated in relationship to Invasive Plant Species (underlining is BCA's): The disruption of native prairie communities potentially has substantial implications for livestock grazing and prairie plant and animal communities dependent on these systems. The restoration of these states requires a substantial commitment of funds and resources. There are no data for the amount and distribution of invaded grass sites in the analysis area, but it is thought to be extensive.

We would also cite:

Recent monitoring of oil and gas sites on the Little Missouri National Grassland found that a largepercentage of the sites were infested with noxious weeds and/or invasive species (Botany Files 2018). (DSEIS, page 93 in reference to oil and gas development sites.)

Newly created edges experience changes in microclimate conditions, which may alter plant communities (Collinge 1996). No habitat fragmentation studies have been conducted with the sensitive plants analyzed in this report; their responses to habitat fragmentation are not known. (DSEIS, page 95.)

Effects associated with weed population expansion may include changes in plant communitycomposition, structure, and function (Mack et al. 2000), which:

[bull] may alter nutrient and fire cycles (Brooks 2008), [bull] result in declines in native plant diversity,

[bull] degrade soil properties (Ehrenfeld 2003),

[bull] decrease the quality and availability of forage for wildlife (Thompson 1996),

[bull] reduce the aesthetic value of the landscape and scientific values of wilderness areas (Montana Department of Agriculture 2017),

[bull] increase encroachment upon rare plant populations and their habitats, and

[bull] produce an overall decline of ecosystem health (Vitousek et al. 1996). (DSEIS, pages 95, 96.)

Indirect effects could occur from changes in soil or site characteristics, resulting in loss or change ofthe supporting substrate for plants, soil compaction, reduced plant vigor, or reduced seed or vegetativereproduction. Oil or other chemical spills could contaminate soils and render them temporarily unsuitable for plant growth until cleanup measures were fully implemented. If cleanup measures wereless than successful, longer-term impacts could be expected.(DSEIS, page 96.)

Soils disturbed by project activities can provide ideal habitat for weeds. Many weeds take advantage of disturbance to invade native plant communities, and the risk of weed spread increases as the extent ofdisturbance increases. (DSEIS, page 96.)

Following establishment, new populations of weeds are often extremely difficult to eliminate, and even if controlled or eradicated, it may take several years or decades to re-establish native soil structure and biota. (DSEIS, page 97.)

The preferred alternative has only "slightly less potential" than what is cited above from existing conditions in Alternative 1. The associated ecological risks are significant and support BCA's recommendation for an Alternative 4, which would reduce risks that are potentially irreversible.

The funding and staffing requirements over decades of oil and gas activity and extended reclamation periods will be considerable. Again, given current under-staffing and limited capacities on the Little Missouri National Grassland, necessary funding and staffing for such vigilance is doubtful at best and may not be forthcoming. Such a reality supports BCA's recommendation for an Alternative 4.

BCA will generally leave comments on wildlife issuesto the expertise of the ND Game and Fish Department and the ND Wildlife Federation. Our greater concern is that if we don't retain the basic building blocks to support wildlife populations, specifics won't matter. Those species with narrow habitat requirements such as the least tern, piping plover and bighorn sheep should be given particular attention under BCA's recommendation of a fourth alternative that looks more closing at leasing/no leasing options. Furthermore, flexibility must be built in to stipulations and mitigation practices that allow for changes in species habits, habitat and patterns due to both oil and gas disturbance and climate change.

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In closing, BCA again requests that further information be made available to the interested public as to current

non-producing, suspended and beyond expiration leases as illustrated in Figure 6 on page 24 of the DSEIS. Targeted formations of non-producing leases and lease dates would be helpful in seeing the full potential for determination of lease and no-lease options in an Alternative 4.

The DSEIS would also benefit from further economic analysis taking into consideration the costs of reduced opportunities for traditional users, for example visitors and agriculture, and the impact of that reduction on surrounding communities.

BCA also finds that under the current scope and scale of industrial oil and gas development in the Little Missouri National Grassland the Forest Service has an obligation to honor its pledge should the Grassland's ecological integrity be threatened, and therein, officially recommend those rare and limited acres of Management Area 1.2A for formal Wilderness designation.

For all the time and effort that has been put into the analysis for this DSEIS, BCA finds the range of alternatives, and especially the "minor" changes found in the preferred alternative, neither adequate nor acceptable to meet the purpose and need. BCA's recommendation of development of an alternative 4 is a place to start correcting this.

Thank you for the opportunity to comment.