

ASSOCIATION OF NATIONAL GRASSLANDS



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U.S. DEPARTMENT OF AGRICULTURE
FOREST SERVICE

FORMAL OBJECTION AND NOTICE OF APPEAL AND STATEMENTS OF REASONS
DRAFT RECORD OF DECISION FOR THE THUNDER BASIN 2020 PLAN AMENDMENT
THUNDER BASIN NATIONAL GRASSLAND
MAY 2020
PURSUANT TO 36 CFR 218

July 14, 2020

ASSOCIATION OF NATIONAL GRASSLANDS, INC.—LEAD OBJECTOR
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I. OBJECTION AND NOTICE OF APPEAL

Appellant's members are Thunder Basin National Grassland users and grazing allottees and file this Appeal and Objection to the Draft Record of Decision (ROD) and Final Environmental Impact Statement (FEIS) for the Thunder Basin National Grassland 2020 Plan Amendment, dated May 2020, and hereby incorporate by this reference all of objector's prior submissions that are part of the project record.

II. RESPONSIBLE OFFICIAL

The Responsible Official for the Draft Record of Decision (ROD) and Final Environmental Impact Statement (FEIS) for the Thunder Basin National Grassland 2020 Plan Amendment is Russell Bacon, Forest Supervisor, Medicine Bow-Routt National Forests and Thunder Basin National Grassland, 2468 Jackson Street, Laramie, Wyoming 82070.

III. SPECIFIC CHANGES IN THE DECISION SOUGHT BY APPELLANT.

- A. The Forest Service must prepare a Supplemental Environmental Impact Statement ("SEIS") in order to fulfill its statutory duties to protect the soil and vegetative cover of the grassland units.

1. STATUTORY DUTIES VIOLATED

- a. The Forest Service Organic Act, 16 U.S.C. Section 551, requires that "[t]he Secretary of Agriculture shall make provisions for the protections against destruction by fire and depredations upon the public forests and national forests[.]"
- b. The Bankhead-Jones Farm Tenant Act, 7 U.S.C. 1010, is the original Organic Act of the National Grasslands and requires that "[t]he Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use, and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impairment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting public lands, health, safety and welfare, but establish private industrial or commercial enterprises."
- c. The very next section of the Bankhead-Jones Farm Tenant Act, 7 U.S.C. 1010a directs that "[i]n recognition of the increasing need for soil, water, and related resource data for land conservation, use, and development for a balanced rural-urban growth, for identification of

prime agriculture areas that should be protected, and for use in protecting the quality of the environment, the Secretary of Agriculture is directed to carry out a land inventory and monitoring program to include, but not limited to, studies and surveys of erosion and sediment damages, flood plain identification and utilization, land use changes and trends, and degradation of the environment resulting from improper use of soil, water and related resources."

2. REGULATORY DUTIES VIOLATED

- a. The National Environmental Policy Act ("NEPA"), 42 U.S.C. Sections 4321 *et seq.*, "contains 'action forcing' provisions to make sure that federal agencies act according to the letter and spirit of the Act." 40 C.F.R. Section 1500.1.
- b. NEPA requires that every environmental impact statement disclose sufficient information to ensure that informed decision-making and informed public participation will take place. 42 U.S.C. Section 4332.
- c. The NEPA process "is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment." 40 C.F.R. Section 1500.1c.
- d. NEPA is designed to integrate "with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively." 40 C.F.R. 1502.2c.
- e. The Forest Service is also required to "[i]n the administration of the National Grasslands the resources shall be managed so as to maintain and improve soil and vegetative cover, and to demonstrate sound and practical principles of land use for the areas in which they are located." 36 C.F.R. Section 213.1d.
- f. NEPA requires Environmental Impact Statements ("EIS") and those documents "shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. Section 1502.1.
- g. The EIS "shall serve as the means of assessing environmental impact of proposed agency actions, rather than justifying decisions already made." 40 C.F.R. Section 1502.2(g).

- h. The Forest Service "shall make sure the proposal which is the subject of an environmental impact statement is properly defined" 40 C.F.R. Section 1502.4(a).
- i. The proposed action of Federal Agencies "which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement." Id.
- j. The Forest Service is required to "employ scoping . . . to related broad and narrow actions to avoid duplication and delay." 40 C.F.R. Section 1502.4(d).
- k. Where an agency has insufficient information relevant to "reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement." 40 C.F.R. 1502.22(a).
- l. The Council on Environmental Quality implementing regulations require that cumulative impacts, connected, cumulative and similar actions "shall" be considered." 40 C.F.R. 1508.25.
- m. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. 1508.7.
- n. NEPA and the Council on Environmental Quality (C.E.Q.) contain the implicit requirement that Environmental Impact Statements contain a reasonably complete discussion of mitigation measures. 40 C.F.R. 1502.14(f) and 1502.16(h).
- o. The C.E.Q. regulations further require the inclusion of mitigation measure discussions in the Record of Decision. 40 C.F.R. 1502.2(2)c.
- p. Mitigation is defined as avoiding or minimizing environmental impacts, rectifying the impact by repairing, restoring or rehabilitating the affected environment, reducing or eliminating the impact over time through preservation or maintenance, and compensating for the impact by providing substitute resources. 40 C.F.R. 1508.20.
- q. NEPA requires that "The information must be of high quality." 40 C.F.R. 1501.1(b).

3. ARGUMENT

The Forest Service's decision to avoid the study of the Alternatives proposed by the Association of National Grasslands, Inc., during the scoping and DEIS process deliberately avoids seminal

issues regarding the environmental damage caused in violation of the afore-mentioned statutory and regulatory authorities. In order to cut down on redundancy, ANG incorporates by reference the formal comments previously submitted in both the 2016 and the current NEPA processes initiated by the Forest Service to confront the obvious problems created by the 2002 LRMP and subsequent Amendments concerning the Thunder Basin National Grassland.

ANG appreciates the Forest Service's efforts to improve the situation and understands the difficulty in addressing a subject so fraught with environmental, political fundraising and possessing many third rails that are even too controversial for this FEIS to truly evaluate. That being said, NEPA requires thorough analysis and critical examination of existing laws and administrative implementation of plans that are so similar that failure to address is an obvious violation of not only NEPA, but the Organic Act of the National Grasslands, the Bankhead-Jones Act, 7 USC 1010 et seq.

"The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct **maladjustments in land use, and thus assist in controlling soil erosion**, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impairment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting public lands, health, safety and welfare[.]" 7 U.S.C. 1010 (emphasis added).

The very next section of the Bankhead-Jones Act states in pertinent part:

"In recognition of the increasing need for soil, water, and related resource data for land conservation, use, and development for a balanced rural-urban growth, **for identification of prime agriculture areas that should be protected, and for use in protecting the quality of the environment**, the Secretary of Agriculture is **directed** to carry out a **land inventory and monitoring program to include, but not limited to, studies and surveys of erosion and sediment damages, flood plain identification and utilization, land use changes and trends, and degradation of the environment resulting from improper use of soil, water and related resources.**" 7 U.S.C. 1010a (emphasis added).

These are not new requirements for the Forest Service to determine whether or not to attempt to evaluate at some point in the future, but rather bed-rock requirements of the Organic Act of 1937. The Forest Service has had more than 80 years to conduct these studies and surveys concerning erosion and sediment damages, and nearly twenty years of damaged rangeland from the current LRMP's decision not to manage the prairie dog population. At what point does the following statement become unacceptable in light of the statutory duties cited above?

"No published or unpublished references documenting and quantifying comparative erosion rates on and off prairie dog colonies are available, and we cannot, at this time attribute accelerated erosion above native rates to prairie dog colonies on the Thunder Basin National Grassland." FEIS at 76.

The Forest Service often ignores and minimizes the agency's duties under the Bankhead-Jones Act. The flagrant disregard of the Organic Act cannot be understated. During the debate of the Organic Act, the Chairman of the United States House of Representatives Appropriations Committee, Congressman Edward T. Taylor, implored the Members of the House to appropriate monies for the acquisition of the lands that now include the Thunder Basin National Grassland.

"The need for an appropriation for Title III is equally urgent. I know I need not describe the alarming condition in the Dust Bowl of the southern Great Plains. Even now a new Dust Bowl is rapidly developing in the northern Great Plains. We can no longer temporize with the situation. If we are permanently to solve the problem, considerable land must be purchased by the Federal Government and the lands restored to grass. Properly handled, such purchases can have an immediate and significant effect upon the use of land in an area much greater than that actually purchased. **I cannot overemphasize that land purchase is an essential key to a permanent rehabilitation of the area.**" Congressional Record, August 17, 1937, Pages 9121-9122 (emphasis added).

The Congressional Legislative Intent of permanent restoration to "grass" is not consistent with the Plan Amendment's desire for "Short-stature vegetation and **bare ground are emphasized** in management area 3.67 or 3.63 due to suitability of soils and existing plant communities and the historic occupation by prairie dogs." FEIS at 69 (emphasis added). The desired 42,000 acres designated 3.67 or 3.63 may be considered a "**degradation of the environment resulting from improper use of soil, water and related resources.**" 7 U.S.C. 1010a (emphasis added).

These are not the only affirmative duties the Agency is shirking: "The Secretary of Agriculture shall make provisions for the protection against destruction by fire and depredations upon the public forests and national forests[.]" 16 U.S.C. Section 551.

The Forest Service statutory duties to be a steward of the soil resource and to abate depredations are specific and clear. Bare ground may not be a management objective. "Grass" and "permanent rehabilitation" certainly does not include bare ground. As the United States Supreme Court recently found in determining that the Endangered Species Act did not trump the Clean Water Act's mandatory duties on the EPA: "a statute dealing with a narrow, precise, and specific subject is not submerged by a later enacted statute covering a more generalized spectrum." National Association of Homebuilders v. Defenders of Wildlife, 551 U.S. 644 (2007). See also, Rounds v. United States Forest Service, 301 F. Supp 2d 1287 (D. Wyo. 2004). "NEPA and NFMA are both supplemental to the Organic Act, which sets out the mandatory duty of the Secretary of Agriculture and the Forest Service to prevent destruction by fire or depredation by insects." Id. at 1292.

- B. The Forest Service must prepare an SEIS in order to fulfill its statutory and administrative duties to rigorously explore and objectively evaluate all reasonable alternatives to protect the soil and vegetative cover of the entire grasslands by

providing appropriate monitoring and enforcement of the Natural Resources Conservation Service site similarity indexes.

1. STATUTORY AND ADMINISTRATIVE DUTIES VIOLATED

- a. Same as Section III.A. above, and 40 C.F.R. 1502.14(a). “Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study briefly discuss the reasons for their having been eliminated.”
- b. NEPA requires that the Forest Service "shall include appropriate conditions [including mitigation measures and monitoring and enforcement programs] in grants, permits or other approvals" and shall "condition funding of actions on mitigation." 40 C.F.R. 1505.3. And those measures adopted must be explained and committed in the ROD.

2. ARGUMENT

The FEIS ignored the two Alternatives proposed by ANG during the scoping and DEIS NEPA process. The proposed alternatives, if evaluated, would have necessarily satisfied the NEPA requirements for the ROD and FEIS. The failure to consider either of the alternatives renders the NEPA planning process inadequate.

ANG proposed an Alternative to evaluate the Buffalo Gap National Grassland LRMP, including Amendments, that have been successful in allowing for a ½ mile boundary management zone for control of the prairie dog population and up to a mile onto the National Grasslands where private property has been repetitiously harmed by colonization. The Buffalo Gap LRMP has also implemented over the past decade a similarity index in order to prevent the grass from deteriorating to bare ground. None of the Alternatives considered in the FEIS evaluated the Buffalo Gap LRMP and Amendments.

The Alternative “section is the heart of the environmental impact statement.” 40 C.F.R. 1502.14. The NEPA process must “[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study briefly discuss the reasons for their having been eliminated.” 40 C.F.R. 1502.14(a). “This court recognizes the broad scope of an agency’s duty to study all reasonable alternatives. Appearing twice in the text of NEPA, the duty is more pervasive than the duty to prepare an EIS.” Bob Marshall Alliance v. Watt, 685 F. Supp. 1514, 1521-22 (D. Mont. 1986).

An Alternative that evaluates the successes and failures of the Buffalo Gap National Grassland LRMP and Amendments should be the launching point for the Thunder Basin NEPA process. Past experience by the same Agency in similar ecological circumstances is, of course, the best indicator of study for future NEPA projects. Why in the world would the same Agency under almost identical circumstances not want to evaluate an existing plan with a decade of experience? Quite frankly, the possible answers to that question are extremely troubling and

clearly outside the rational interpretation of NEPA. Instead the Forest Service dismissed such an Alternative in the following manner:

"While similarity index may serve as an informative measure of plant communities, experience using similarity index as a management trigger for other purposes and in other locations has demonstrated that it would be inappropriate to apply it exclusively to guide prairie dog management." FEIS at 52.

Is the Forest Service stating that the Buffalo Gap LRMP's implementation of a similarity index is inappropriate? If that is a true and accurate statement, the Buffalo Gap LRMP is fatally flawed and a NEPA process should have already been initiated for the Buffalo Gap National Grassland. No such NEPA process has been initiated concerning the current Buffalo Gap National Grassland LRMP.

NEPA documents "shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. Section 1502.1. Decreeing the Buffalo Gap LRMP as "inappropriate" does not make it so. The Buffalo Gap LRMP is clearly relevant, presents a track-record, and is a reasonable alternative worthy of evaluation during the Thunder Basin Amendment process. The "inappropriate" label, devoid of explanation and evaluation, is inappropriate and deficient NEPA planning.

"NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail." 40 C.F.R. 1500.1(b).

Further, the blanket statement that "A 1/2 -mile boundary was not considered due to limitations of land ownership patterns" is also deficient. FEIS at 51. There are also limitations due to land ownership patterns on the Buffalo Gap National Grasslands. Without evaluation and explanation of that sweeping statement during the NEPA process, how is the public allowed to meaningfully participate in the Thunder Basin NEPA process? A serious NEPA evaluation would make it possible to deduce any extreme limitations in the Thunder Basin that are not present on the Buffalo Gap National Grassland. Without more, ANG cannot further comment on the specter of limitations resulting from land ownership patterns. Conclusory documents and analysis of cumulative effects may render the EA inadequate. Friends of the Earth, Inc. v. United States Army Corps of Eng'rs, 109 F. Supp. 2d 30 (D. D.C. 2000).

- C. NEPA documents "shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. Section 1502.1. The Forest Service must prepare an SEIS in order to fulfill its statutory and administrative duties to protect health of the prairie dog population and the soil and vegetative cover of the entire area and discuss and

specify what mitigation measures will be taken to move towards desired vegetative cover, topsoil protection, and undesirable plant reduction.

1. STATUTORY DUTIES VIOLATED

- a. The National Environmental Policy Act, 42 U.S.C. 4332(2)C, requires that the Forest Service, in preparation of environmental documents, shall contain a "reasonably complete discussion" of mitigation measures for "any adverse environmental effects which cannot be avoided."

2. ADMINISTRATIVE DUTIES VIOLATED

- a. Council on Environmental Quality Regulation 40 C.F.R. 1508.20 defines the mitigation required by the National Environmental Act and includes avoiding or minimizing environmental impacts, rectifying the impact by repairing, restoring or rehabilitating the affected environment, reducing or eliminating the impact over time through preservation, and compensating for the impact by providing substitute resources.

3. ARGUMENT

The United States Supreme Court has found that an "omission of a reasonably complete discussion of possible mitigation measures would undermine the 'actionforcing' function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects." Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 352, 371 (1989). See also, Northwest Indian Cemetery Prot. Assn. v. Peterson, 565 F. Supp. 586 (N.D. Cal. 1983)(holding that an impact statement for a road through a national forest was inadequate because it did not discuss mitigation measures for water quality and fish habitat). Neighbors of Cuddy Mountain v. United States Forest Service, 137 F.3d 1372 (9th Cir.1998)(holding that the Forest Service provided only perfunctory mitigation measures to offset the damage to stream habitat that would be done by sedimentation for a timber sale).

The FEIS does not acknowledge or address what the Grazing Associations have been raising since the LRMPs were adopted for the Thunder Basin and Buffalo Gap National Grasslands at least since 2002.

"The ROD and FEIS do not deal with the body of research showing that large, dense prairie dog colonies are more vulnerable to plague." Notice of Appeal and Statement of Reasons for NNF Plan Revision and FEIS, at Page 8 (November 12, 2002).

The ROD, FEIS and supplementary documents thereto are utterly devoid of addressing the seminal issue of how "large, dense prairie dog colonies" facilitate plague epizootics. This unexplained phenomenon of how the Forest Service can completely avoid what is right at the

forefront of this discussion is more than astounding. On the first page of the 2020 Thunder Basin Draft ROD, the following statement is made:

Between 2015 and 2017, prairie dog colonies expanded to more than 75,000 acres of colonies on the Thunder Basin National Grassland including intermixed non-Federal lands, an extent far greater than anything recorded in recent history. Very few tools were available to rapidly respond to and control colony expansion. In 2017, a landscape-scale plague epizootic occurred in prairie dog colonies across the grassland, resulting in a decline to 1,100 acres of colonies by 2018." ROD at Pages 1 and 2.

Albert Einstein is widely credited with saying, "The **definition of insanity** is doing the same thing over and over again, but expecting different results." Although proof of insanity is not the standard, the much lower thresholds of requiring the Agency to take a hard look and not act in an arbitrary and capricious manner may be satisfied by Einstein's maxim.

In determining whether the agency acted in an arbitrary and capricious manner, we must ensure that the agency decision was based on a consideration of the relevant factors and examine whether there has been a clear error of judgment. ... We consider an agency decision arbitrary and capricious if the agency ... relied on factors which Congress had not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.

Trout Unlimited v. U.S. Dept. Of Agriculture, 320 F.Supp.2d 1099 (D.Colo. 2004), quoting Colorado Env'tl. Coalition v. Dombeck, 185 F.3d 1167 (10th Cir.1999).

The ROD and FEIS improperly sets aside the decision of whether to: 1) manage the prairie dog population in the area in large, dense populations, or 2) to manage in smaller and disconnected colonies, is the most advantageous to preventing epizootics and enhancing the health and vigor of the prairie dog population. This segmented approach provides no mitigation from the environmental damage that has already been caused. The FEIS does not devote a section to mitigation for the environmental damage to the range caused by or to the prairie dog population, nor does it give more than perfunctory mitigation measures to offset the damage caused to the range or the health of the prairie dog population. The appellants request that these effects be properly evaluated; however, the Forest Service has continued to violate 40 C.F.R. 1502.22(a), which requires that where "information relevant to adverse impacts is essential to a reasoned choice among alternatives and is not known and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement."

This ROD and FEIS has done nothing to mitigate the impacts created by providing for rectifying, repairing, restoring or rehabilitating the affected environment as required by 40 C.F.R. 1508.20. The hard look doctrine requires that a reviewing court determine the following:

Its supervisory function calls on the court to intervene not merely in the case of procedural inadequacies, or bypassing the mandate in the legislative charter, but more broadly if the court becomes aware, especially from a combination of danger signals, that the agency has not really taken a "hard look" at the salient problems, and has not genuinely engaged in reasoned decision-making. Greater Boston Television Corp. v. Federal Communications Commission, 444 F.2d 841 (D.C. Cir. 1980).

Not only did the Forest Service bypass the legislative charters or organic acts of the Forest Service and the National Grasslands by segmenting the evaluation areas, but it has not taken a hard look at the causation of overgrazing by prairie dogs, or the causation and cumulative effects of epizootics. Continuing to attempt to ignore evaluating and placement of the blame for epizootics without any scientific analysis of the causation identified herein makes it clear that the Forest Service "has not genuinely engaged in reasoned decision-making." *Id.* Rather, the Forest Service continues to violate 40 C.F.R. 1502.2(g) which requires that the NEPA process "shall serve as the means of assessing environmental impact of proposed agency actions, rather than justifying decisions already made." Unfortunately, the Forest Service has again chosen not to evaluate the real causes of the environmental deterioration, but rather engages in attempts to justify its actions by shifting blame without evaluation.

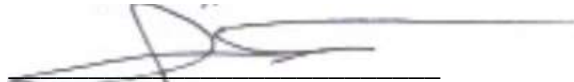
IV. CONCLUSION

The Association of National Grasslands, Inc., is greatly concerned by the deliberate efforts of the agency to mask, ignore and obfuscate the cause and effect analysis required by all of the above federal statutes, regulations and authorities. The Bankhead-Jones Act places affirmative obligations that are over and above the Forest Service's normal obligations for management of the National Forests. The Bankhead-Jones Act obligations cannot be overlooked. During the debate of this Act, Congressman Hildebrandt of South Dakota stated that **"The objective of the land-buying program as illustrated by projects with which I am familiar in my State is to help these farmers change from crop farming to cattle grazing. . . . Therefore the land-utilization program is buying up private land and throwing it in with the public land to make a big grazing range which the stockmen of the region can use. . . . But the basic purpose of this land adjustment work is to make the land more capable of supporting a population and thereby serving as a greater benefit to the community dependent upon it."** Appendix to the Congressional Record, Tuesday, June 29, 1937, page 1620.

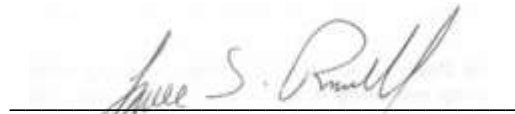
Further, the Declaration of Takings Act (46 Stat. 1421) required the delineation of the public use for which these lands were taken. In the Matter of 2,200 acres of land in Pennington and Fall River Counties, (29 W.D.) the stated acquisition purposes were **"that said lands are necessary in my opinion to establish a demonstrational area for public grazing of livestock, including the development of water resources, the prevention of soil erosion and the control of destructive animal life."** These authorities are particular to these National Grasslands in the project area and will not be forgotten and deliberately ignored.

V. REMEDIES REQUESTED:

- A. An SEIS must be prepared to properly evaluate the range of alternatives expressly allowing the implementation of the Natural Resource Conservation Service similarity index of 25% in the management area.
- B. An SEIS must be completed to expressly set forth the mitigation measures that will be taken to repair, restore and rehabilitate to the entire management areas and consistent with to the NRCS SI of at least 25%.
- C. An SEIS must be completed to eliminate the arbitrary and capricious decision to exclude NEPA consideration of the Alternatives proposed by ANG during the scoping and DEIS planning phases, including an evaluation of the similar, monitored and decade-long implementation of the Buffalo Gap National Grassland Amended LRMP.
- D. An SEIS must be completed to take the hard look required at the causation and cumulative impacts of allowing large, densely populated prairie dog complexes to potentially facilitate plague epizootics.



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