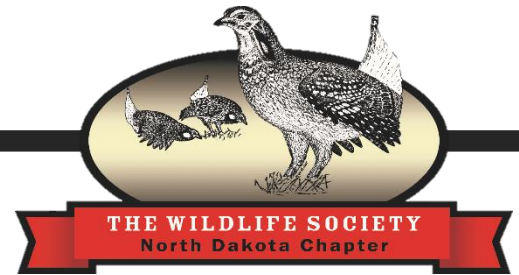


North Dakota Chapter

THE WILDLIFE SOCIETY

P.O. Box 1442 • Bismarck, ND 58502



October 1, 2020

Objection Reviewing Officer
USDA Forest Service, Northern Region, 26
Fort Missoula Road, Missoula, MT 59804

RE: Final Supplemental Environmental Impact Statement and Draft Record of Decision, Little Missouri National Grassland, Dakota Prairie Grasslands
William O'Donnell, Grassland Supervisor, Dakota Prairie Grasslands
Acting Official, Jeff Tomac, Acting Grasslands Supervisor

Objection Reviewing Officer:

The North Dakota Chapter of the Wildlife Society (Chapter) is an active affiliate of TWS. It is specifically concerned with approaches to effective management of North Dakota's plant and animal communities. The Chapter provides expertise in advising legislative and judicial processes surrounding the controversial management of many natural resource assets. It advocates the holistic treatment of environmental questions. The Chapter was founded in 1963 and incorporated in 1981 under the laws of North Dakota. The mission of the North Dakota Chapter of the Wildlife Society is to provide a forum for discussion of ecological issues among natural resource professionals; to enable its membership to pursue conservation of natural resources; and to inform the public on ecologically wise uses of natural resources in support of a conservation ethic.

The Chapter has been made aware of the Final Supplemental Environmental Impact Statement (FSEIS) and Draft Record of Decision (DROD) recently released. In this letter, the Chapter provides an official objection to the proposed 3B Alternative in the DROD, specifically the decision to allow controlled surface occupancy and new road development in Protected Areas of the Little Missouri National Grasslands.

As presented in the DROD, the 3B Alternative would allow for surface occupancy within 0.25 miles of an existing road within areas designated under the Roadless Rule. Not only does this decision allow for surface occupancy in areas previously designated NSO (no surface occupancy), it also goes against the Roadless Rule Area designation by allowing new access roads to each new well pad constructed. This change opens 6,800 new acres to leasing. However, it also provides approximately 13,000 additional already-leased acres the opportunity to develop with surface occupancy (provided by an analysis conducted by the Backcountry Hunters and Anglers using DPG data obtained from the supporting documents). The development of these nearly 20,000 acres will have long lasting, detrimental impacts to both wildlife, including rare

and declining species as well as prized game species, and the many individuals who enjoy North Dakota's National Grasslands for hunting and recreational opportunities.

The Chapter is disheartened to see lands designated under the Roadless Areas Rule being subject to further development, especially without the involvement of the State wildlife agency, the public, and other invested stakeholders. This is not a minimal change with little impact on the state's natural resources. Until further review of these impacts can be done and an opportunity for the public to comment is provided, the Chapter believes the Controlled Surface Occupancy (CSO) stipulation within areas inventoried as roadless be removed from the DROD.

Sincerely,

A handwritten signature in cursive script that reads "Patsy Crooke".

Patsy Crooke, Past President
North Dakota Chapter of the Wildlife Society