

October 1, 2020

Subject: Northern Great Plains Management Plans Revision
Final Supplemental Environmental Impact Statement for Oil and Gas Leasing
Responsible Official: Jeff Tomac, Acting Grasslands Supervisor
Little Missouri National Grasslands
Via Email: appeals-northern-regional-office@usda.gov

Dear Objection Reviewing Officer,

Badlands Conservation Alliance (BCA) is a non-profit organization based in western North Dakota that is dedicated to the wise stewardship of public lands, in particular the Dakota Prairie Grasslands (DPG) and Little Missouri National Grasslands (LMNG). Many of our members live in or originated in the small communities and rural landscapes surrounding these public lands. Members hold significant familiarity with these lands and value them for a host of ecological, heritage and personal reasons, frequently through multiple generations.

National Parks Conservation Association (NPCA) is a national non-profit founded in 1919. NPCA's mission is to protect and enhance America's National Park System now and for future generations; we along with our more than 1.3 million members and supporters nationwide, continue to fulfill this mission by working to connect our national parks with their surrounding landscapes. NPCA has a long history of advocating for Theodore Roosevelt National Park and the surrounding grasslands.

Our objections focus on modification of the No Surface Occupancy (NSO) for roadless areas in Alternative 3 to the Controlled Surface Use (CSU) stipulation for 0.25 mile on each side of the center-line of existing roads within certain inventoried roadless areas in Preferred Alternative 3B. We estimate this will impact approximately 19,750 additional acres that were not examined in the 2018 DSEIS.

Preferred Alternative 3B fails to provide adequate protection to areas Suitable for Wilderness and Nonmotorized Backcountry Recreation Areas by allowing Controlled Surface Use on Inventoried Roadless Areas. The preservation, character and integrity of these areas will be severely compromised under Preferred Alternative 3B. The Deciding Official in Dakota Prairie Grasslands Land and Resource Management Plan (2002 ROD) wrote that Suitable for Wilderness Areas "will be managed to allow uses and activities if they would not preclude wilderness designation." There is no doubt that allowing controlled surface use within these inventoried roadless areas will compromise future wilderness designation. The FSEIS itself (page 137) acknowledges that the effects to the natural character would be such that any future wilderness designation would be unattainable. We find the preferred alternative to be wholly unacceptable.

We also believe that Preferred Alternative 3B would violate the 2001 Roadless Area Conservation Rule, which prohibits the Forest Service from authorizing new road construction or reconstruction within inventoried roadless areas. Yet, the preferred alternative would allow construction of well pads within 0.25 miles (1,320 feet) from the centerline of existing level 3, 4 or 5 roads at the time of the proposal. It seems obvious to us that access roads would have to be built between the existing road and the well pad, which would be in violation of the Roadless Rule. Furthermore, the phrase "at the time of the proposal" (FSEIS p. 136) suggests to us the possibility that access roads may

connect to newly constructed access roads, creating an even more fragmented landscape and encroaching even further into Inventoried Roadless Areas.

We do note that the FSEIS states that “the space between the pad and the road cannot be greater than 100 feet” (FSEIS p. 136). This seems inconsistent with the 0.25 mile buffer from the centerline of existing roads for construction of new well pads. Whether 100 feet or 0.25 mile, any encroachment on Inventoried Roadless Areas is in violation of the Roadless Area Conservation Rule. We strongly object to inclusion of Controlled Surface Use stipulations in roadless areas.

We request that any modifications to the 140,000 acres of roadless areas that are protected in the Land and Resource Management Plan (LRMP) for Dakota Prairie Grasslands be addressed either through a publicly noticed plan amendment or through a plan revision.

Respectfully,

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