



2/20/2024

South Dakota Natural Resource Conservation Service
Deke Hobbick, Assistant State Conservationist
Tami Burmeister, Secretary
200 4th Street SW, Suite 203
Huron, South Dakota 57350

Dear Mr. Hobbick and Ms. Burmeister,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the proposed DoneGone, LLC Wetland Project in Racine Township, Day County, South Dakota.

The Division has a long history of advocating for improved water quality and protecting South Dakota's wetlands. As we've stated in previous wetland mitigation proposals, the Division encourages all landowners to conserve and protect wetlands utilizing available conservation programs. We believe wetland mitigation should only be the last resort, not the first option.

We think all wetland mitigation bank sites must meet performance standards including:

- Strict adherence to reporting deadlines
- Compliance to a long-term maintenance plan
- Penalties for non-compliance

The Division renews our previous concerns on wetland mitigation bank site monitoring. With South Dakota's highly variable climate, it may take a long time to fully establish vegetation and/or to repair hydrologic functions on a degraded site.

We believe:

- The three-year monitoring period may not be adequate to determine if wetland values are fully restored or to successfully establish the upland buffer and wetland vegetation.
- An adaptive management plan must be developed if the site is not meeting its performance standards.
- A longer, more robust monitoring period should be created for all wetland bank mitigation sites.
- A long-term management fund for maintenance and management must exist to ensure all planned ecological functions are met.

This proposed Bank Site covers 122.7 acres and would be protected by a perpetual conservation easement. The site is in the Upper Big Sioux Geographical Service Area adjacent to Waubay Lake and the Waubay National Wildlife Refuge.

This area of South Dakota has experienced a lot of agricultural conversion of wetland and grassland habitats resulting in a loss of wetland functions in this critical waterfowl production area.

The Division understands this project could obtain 30.9 wetland exchange acre-credits by restoring and creating wetlands and establishing wetland vegetation. Wetland restoration would be accomplished by constructing or rebuilding ditch plugs on previously drained wetlands and by creating three wetlands.

The restored wetland areas must meet the three standard wetland criteria in the NRCS Wetland Determination guidance that include:

- Hydric soils
- Hydrophytic vegetation
- Wetland hydrology

The project plans to re-establish upland buffers around the wetlands by:

- Seeding native grass and forb species
- Using approved native habitat restoration methods

The restored wetlands are expected to provide:

- Flood water storage,
- Improved water quality
- Wildlife habitat

According to the site plan, monitoring will be done for three years starting with the first growing season after the site is established. Areas downstream of the discharge must also be inspected for scouring or erosion that could cause issues on, or adjacent to, this site. The monitoring must include:

- An annual report to the NRCS
- Measuring progress against established performance standards
- Identifying needed maintenance for:
 - Vegetation
 - Hydrology
 - The constructed features

Maintenance is essential to ensure vegetative quality and the integrity of the constructed components. Maintenance or repair plans must be developed and sent to the NRCS before any work is done.

Maintenance must include:

- Control of invasive or noxious plants
- Mowing or spraying with an aquatic-safe herbicide in wetland areas
- Mowing only outside of the primary bird nesting season (April 15-August 1)
- Complying with the Migratory Bird Treaty Act and state and federal guidance
- Periodic grazing under the terms of the conservation easement
- A long-term management plan

The Division supports that an adaptive management plan be completed and implemented if the site isn't meeting the established performance standards. The adaptive management plan must guide the revisions of the original plan and outline needed maintenance or repair work.

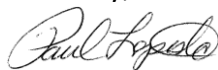
We understand the landowner is working with U.S. Fish and Wildlife Service at the Waubay National Wildlife Refuge on long-term plans for this bank site. Plans include a possible transfer of ownership of this site to USFWS. We support a long-term plan that includes periodic grazing and/or haying of the upland areas to help meet the site's goals and objectives.

The Division endorses the use of best management practices on this site that:

- Prevent erosion
- Control sediment
- Prevent impacts to adjacent waters
- Adhere to county rules and ordinances
- Obtain erosion and sediment control construction permits

The South Dakota Division of the Izaak Walton League of America thanks you for this opportunity to comment on the proposed DoneGone, LLC Wetland Project in Racine Township, Day County, South Dakota. Thank you for your time and consideration.

Sincerely,



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