



The Izaak Walton League of America

Defenders of Soil, Air, Woods, Waters, and Wildlife

February 3, 2023

Re: SD IWLA Comments on the Proposed Mike Grace Wetland Mitigation Bank Site

South Dakota NRCS
Deke Hobbick
Assistant State Conservationist for Compliance
200 Fourth Street SW
Huron, SD 57350-2475

Dear Mr. Hobbick,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the proposed Mike Grace Wetland Mitigation Bank Site in Minnehaha County. The site includes 14.25 acres and is protected by a perpetual conservation easement. The project has 9.6 acres of wetland and 4.7 acres of upland buffer.

The proposed project aims to restore wetland hydrology and re-establish vegetative cover that has been damaged by drainage and agricultural use. The plan includes reestablishing a self-sustaining, functional wetland that will benefit wildlife, increase flood storage, and improve water quality.

The Division is a long-time proponent of improving water quality and protecting South Dakota's wetlands. As stated in previous wetland mitigation site proposal comments, the Division urges all landowners to conserve and protect wetlands through 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 that include:

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

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

- Three years is not enough time to determine if wetland values have been fully restored or if the upland buffer is completely established.
- 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 needs to exist to ensure all planned ecological functions are met.

The Division supports controlling invasive species and noxious weeds by mowing or with chemical treatment. Mowing on wetland bank mitigation sites must be done outside of the primary bird nesting season (April 15-August 1), to comply with the Migratory Bird Treaty and state and federal guidance.

We support periodic grazing on mitigation sites, when conducted under the terms of the conservation easement. Periodic disturbance of the upland vegetation should be part of the site's long-term management plan to help meet the project's stated goals and objectives.

The South Dakota Division of the Izaak Walton League of America thanks you the opportunity to comment on the proposed Mike Grace Wetland Mitigation Bank Site Plan. We respectfully ask for a timely response to our comments, and to be kept informed on this and other proposed wetland mitigation bank site plans.

Sincerely,



Paul Lepisto

Regional Conservation Coordinator

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