

**FINDING OF NO SIGNIFICANT IMPACT  
FOR  
GOLDEN COYOTE ANNUAL TRAINING ACTIVITIES IN  
BLACK HILLS, SOUTH DAKOTA**

The South Dakota Army National Guard (SDARNG) prepared an environmental assessment (EA) to identify and evaluate potential environmental effects during the annual training conducted in June in the Black Hills, South Dakota. SDARNG prepared the EA in accordance with the National Environmental Policy Act (NEPA) (42 USC §§ 4321 to 4370e), the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500–1508) and the *Environmental Analysis of Army Actions* (32 CFR Part 651).

**1. Description of the Proposed Action and Alternatives**

**Proposed Action.** SDARNG proposes to conduct short-term bivouac and tactical training each year at approximately 5 to 7 of the 41 proposed sites in the Black Hills National Forest (BKNF), Custer State Park, and the Bureau of Reclamation (BOR) Belle Fourche Reservoir during a 2-week period in June each year from 2019–2029 as part of the Golden Coyote annual training exercises. The exercises are supported by a main operating base (SDARNG Headquarters Camp Rapid) located in Rapid City, South Dakota. Bivouac training is defined as any military encampment area set up with tents, kitchens, showers, and portable toilets with the perimeters surrounded by (temporary and or simulated) fighting positions. All 41 sites have been part of previous exercises.

Training areas are selected from the 41 proposed sites on an annual basis, based on specific criteria: proximity to improved roads, distance from areas of environmental concern, or suitability for a particular training event. BKNF and BOR issue special use permits to conduct these training activities on properties under their jurisdictions, which may include restrictions based on current knowledge of the site-specific conditions. SDARNG submits an annual Operations Plan to BKNF, Custer State Park, and BOR each training year.

**Alternatives Considered.** SDARNG explored four alternatives consisting of: Proposed Action—Training within the Black Hills National Forest, Custer State Park, and Belle Fourche Reservoir, Alternative 2—No Action, Alternative 3—Training Elsewhere than Western South Dakota, and Alternative 4—Bivouac outside the Black Hills National Forest, Custer State Park, and Belle Fourche Reservoir and Train on the Black Hills National Forest, Custer State Park, and Belle Fourche Reservoir.

Alternative 3 and Alternative 4 were eliminated from further analysis because they did not meet the screening criteria and would result in an action that was not practical or feasible from a technical and economic standpoint or supportive of the purpose and need for the Proposed Action.

SDARNG established and applied the following selection criteria to screen and evaluate these alternatives. An alternative must meet the following listed screening criteria:

1. Size—Training area(s) must be of adequate size to accommodate the collective exercises that involve 1,500–3,500 troops composing engineer and support units.

2. Remoteness—Training areas must be located away from densely populated areas, such as communities, campgrounds, recreation areas, tourist attractions, and other areas where numbers of people congregate.
3. Cost-Effectiveness—Efficient and economical training to established army standards is necessary.
4. Travel Distance—Travel time should be minimized so that effective training time can be maximized.
5. Military Mission Essential Training—Training should focus on accomplishing mission essential tasks. Whenever possible, these tasks should be executed in a tactical environment and allow for flexibility in situations of civilian/military interaction. Training activities (construction projects in particular) should be compatible with the military assets (units) that are available for the exercise.
6. Use Agreement—Training areas on property under the jurisdiction of the BKNF/US Forest Service special use permit and BOR special use permit must be consistent with permit terms. SDARNG coordinates with the hosts—BKNF, Custer State Park, and Belle Fourche Reservoir—to determine the training areas each year. The training areas and any specific use conditions or restrictions are documented

Under Alternative 2, the No Action Alternative, the proposed action would not be implemented. Annual bivouac and tactical training exercises in western South Dakota would be discontinued. SDARNG would seek other locations to complete its requisite training to comply with National Guard Regulation 350-1 (Department of the Army, 2009<sup>1</sup>). The No Action Alternative serves as the baseline comparison for environmental effects between existing conditions and the proposed alternative, as required under Federal law. Although the No Action Alternative does not meet the selection criteria, it is carried forward and is used as a baseline for comparison.

## **2. Environmental Analysis**

This EA is composed of the entire EA and all the documents found in the appendices. The EA fully describes the potential environmental impacts associated with the proposed action. The EA identifies the environmental resources that could be affected by the proposed action and determines the significance of the impacts, if any, to each of these resources. Based on the analysis contained in the EA, SDARNG determined that the known and potential environmental impacts from the proposed action on land use, air quality, noise, geology and soils, water resources, cultural resources, biological resources, socioeconomics, environmental justice, infrastructure, and hazardous and toxic materials and wastes would be less than significant.

Because the proposed action will take place over a 10-year time frame, SDARNG will capture the annual training events in an Army National Guard REC/CHECK. Further, SDARNG will perform a “hard look review” of this NEPA analysis at year 5 of this 10-year proposed action. With this “hard look review,” SDARNG, in consultation with Army National Guard Installation and Environment Directorate, will ensure no substantial changes have occurred to environmental resources or regulatory requirements since the completion of this EA. If substantial changes have occurred, the SDARNG will prepare an updated NEPA analysis (e.g., a Supplemental EA). This original EA

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<sup>1</sup> Department of the Army. 2009. AR 350-1: Army National Guard Training. 4 August 2009.

would be used as the foundation for the updated analysis and supplemental NEPA analyses would focus on those issues that have changed.

### **3. Mitigation and Best Management Practices**

As part of the Golden Coyote exercise, SDARNG developed Rules of Occupation, which comply with special use permits and include environmental best management practices, specific area use conditions, and restrictions or coordination requirements with BKNF, Custer State Park, or BOR to avoid, minimize, and mitigate any potential impacts. Environmental best management practices, as defined in the Army National Guard's NEPA Handbook (National Guard Bureau, 2011<sup>2</sup>), are practical, economical, and effective management or control practices that manage or prevent pollution or other adverse effects to environmental resources. Past experience has enabled SDARNG to develop these rules and adjust site selection and use for each training cycle to manage the potential for impacts in compliance with Army regulations and commitment to environmental stewardship. SDARNG will also coordinate, as appropriate, with those agencies that require coordination before each cycle of training exercises.

### **4. Regulations**

The proposed action will not violate NEPA; Council on Environmental Quality Regulations (32 CFR 651); or any other Federal, state, or local environmental regulations.

### **5. Commitment to Implementation**

The National Guard Bureau and SDARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation depends on funding. The SDARNG and the Army National Guard's Installations and Environment Directorate and Training Directorate (both on behalf of the National Guard Bureau) will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

### **6. Public Review and Comment**

The EA, draft Finding of No Significant Impact was made available for stakeholder review and comment from May 1, 2019, to May 16, 2019, at the locations listed in the draft EA's public notice. \_\_\_\_\_ commenters provided a total of \_\_\_\_\_ comments regarding the project. SDARNG reviewed and responded to all comments. See attached comment matrix and Appendix E of the EA.

### **7. Finding of No Significant Impact**

After careful review of the EA, I have concluded that implementation of the proposed action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. This analysis fulfills the requirements of NEPA and Council on Environmental Quality regulations. An environmental impact statement will not be prepared, and the National Guard Bureau is issuing this Finding of No Significant Impact.

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<sup>2</sup> National Guard Bureau. 2011. The Army National Guard NEPA Handbook, Volume 1: Leadership (Proponent's) Guide to NEPA, Volume II: Practitioner's Guide to NEPA. Prepared by Army National Guard, Arlington, VA.

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Date

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