



# Air Quality

## Comments and Responses on Draft Assessment



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## **Introduction: Assessment Response to Comments**

The Black Hills National Forest received a variety of public comments on draft assessments published in June 2022. Some commenters have expressed support for the draft assessments, while others have expressed concerns.

Those who express concern about the draft assessments often state that they believe the assessments do not go far enough in addressing the challenges facing the Black Hills; do not address the needs of local communities; or do not utilize the best available scientific information. Those that support the draft assessments often state that they are pleased with the level of detail and analysis that went into the assessments. They believe it will provide a good foundation for the need to revise the land management plan.

The Forest Service has reviewed all public comment received on the draft assessments and used this feedback to revise assessments where appropriate. The table below is a detailed summary of public comment received related to air quality as well as the agency's response to each item. Many responses indicate where the revised assessment has been modified to better explain each item, or incorporate new information as provided by cooperators or the public.

Each comment and response table is provided not as a matter of regulatory compliance, but as an effort to demonstrate the Black Hills National Forest's commitment to transparency early in the plan revision process. Some comments below have been generalized or combined with similar comments to provide a more efficient response. No attempt has been made to retain a link between each comment and individual, organization, or entity that provided it.

## Response to Comments

Comment	Responses
<p>Why is air quality identified as a key issue when overall air quality is summarized as good with the states forecasting improved conditions as described in chapter 3.</p>	<p>Air quality is a required topic during the initial assessment phase of plan revision. Requirements for the Black Hills to assess air quality at part of this effort can be found in FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK CHAPTER 10 - ASSESSMENTS: 12.21 – Assessing Air Quality. This section explains that the assessment should describe existing conditions and trends of airshed conditions and air quality. Considerations for the air quality assessments include:</p> <ol style="list-style-type: none"> <li>1. Identify the airsheds relevant to the plan area.</li> <li>2. Identify within the relevant airsheds the location and extent of known sensitive air quality areas, such as class I areas, nonattainment areas, and air quality maintenance areas.</li> <li>3. Identify emission inventories, conditions, and trends within the relevant airsheds.</li> <li>4. Identify the relevant Federal, State, and Tribal agency implementation plans for regional haze, nonattainment, or maintenance areas and determine whether Forest Service emission estimates have been included in the appropriate agency implementation plans.</li> <li>5. Identify critical load exceedances for the plan area. If critical load exceedances occur on the plan area, assess the extent and severity of these exceedances.</li> <li>6. Using the information gathered from items 1 through 5, document the conditions and trends of relevant airsheds assuming existing plan direction remains in place.</li> </ol> <p>We will continue to coordinate with South Dakota and Wyoming on air quality data and any issues throughout plan development.</p>
<p>A substantive issue is a point of disagreement, debate or dispute about an activity or the condition of a resource with a cause-and-effect relationship identified.</p>	<p>Two key air quality issues concerning the Black Hills National Forest are identified in the air quality assessment: air pollution produced in and around the Forest and impacts from air pollution to human health and natural resources. The assessment serves as a document for current conditions but does not claim issues as substantive or non-substantive. Cause and effect relationships between activities and environmental effects will be analyzed during the National Environmental Policy Act (NEPA) phase of plan revision.</p>
<p>It would be a good idea to explain why Custer County numbers are so much higher than other counties in this table.</p>	<p>As noted by the comment, Custer County has much higher emissions for Ammonia, Carbon Monoxide, particulate matter, sulfur dioxide, and volatile organic compounds than other counties analyzed. Further analysis as to why these numbers are higher than other counties is beyond the scope of this assessment.</p>

*Black Hills National Forest  
Response to Comments—Air Quality*

<b>Comment</b>	<b>Responses</b>
<p>Remove agricultural practices from the Air Quality Assessment. There is no supporting documentation of agricultural activities within the Black Hills National Forest having an impact on air quality.</p>	<p>The air quality assessment mentions agricultural burning as a fire-related activity that can impact air quality. It also mentions ammonia emissions associated with certain types of agricultural practices. These are appropriate for inclusion into the assessment. Air pollution moves across political boundaries and can affect forest resources from sources originating outside the Forest boundary. Forest Service Handbook directs these assessments to analyze and document air quality both on the Forest and within the greater plan area.</p>
<p>Reconsider your statement that the Black Hills National Forest (Forest) is affected by some nearby and regional sources of air pollution, including oil and gas production, power plants, agriculture.</p>	<p>Thank you for your comment. It is appropriate to consider oil and gas, power plant emissions, and agricultural emissions in the air quality assessment for the Black Hills National Forest. Some sources may originate from the Black Hills National Forest and other sources may not be on lands management by the Forest but can still affect Forest resources.</p>
<p>The Black Hills National Forest has no control of activities not located on the Forest and cannot provide an adequate reference or have data to reference outside contributors.</p>	<p>Datasets for air quality are generally collected at the state and county levels so this is reflected in the assessment. Air quality pollutants that originate outside of the Black Hills National Forest (Forest) can impact air quality on the Forest, and visa vera. The Black Hills National Forest cannot control most sources of air pollution. However, it is appropriate to discuss sources and types of air quality that can impact resources on the National Forest in this assessment.</p>
<p>The Wyoming Department of Environmental Quality-Air Quality Division has jurisdiction over air quality in the State of Wyoming.</p>	<p>Thank you for your comment. A sentence has been added to the assessment to clarify the jurisdictional issue and the role of state jurisdiction, particularly the States of South Dakota and Wyoming.</p>
<p>Reconsider statement that nitrogen comes from both natural (wildfires and lightning) and human sources (power plants, industrial facilities, and agriculture).</p>	<p>The assessment considers nitrogen deposition which can happen from a variety of activities. Impacts to nearby Wind Cave National Park, as well as Class I and Class II airsheds are documented throughout.</p>

<b>Comment</b>	<b>Responses</b>
<p>Air Quality (Also see: Socioeconomics - Infrastructure - Ecological Integrity of Forested Ecosystems: Status &amp; Trends - Ecological Integrity of Non-Forested Ecosystems: Status &amp; Trends - Fire and Fuels - Cultural Resources – Timber - Carbon - Renewable and Non-Renewable Energy and Mineral Resources) Dust created by tens of thousands of off highway vehicles (OHVs) on roads and trails is making air quality bad. Need for change: A much smaller motorized trail and road system. Need for change: limit the amount of open ground at any given time. That would include roads, trails, mines, skid trails and logging landings.</p>	<p>Thank you for your comment. Dust from OHVs and other vehicles on forest service roads and trails can contribute to air quality on the Black Hills National Forest. This may be identified as an issue during the upcoming forest plan revision and could include forest plan standards and guidelines to address dust from recreational and other activities. We look forward to working with the public to evaluate this potential issue.</p>