



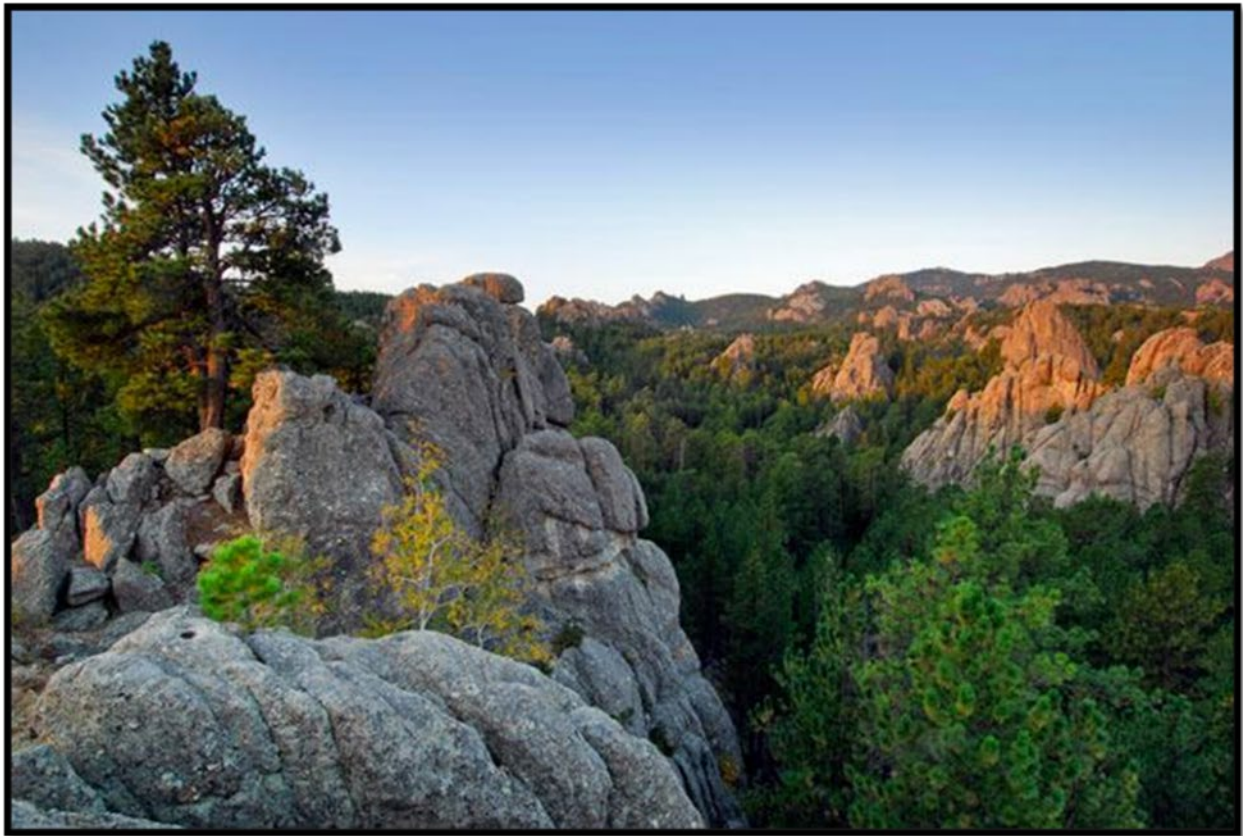
Forest Service  
U.S. DEPARTMENT OF AGRICULTURE

Rocky Mountain Region / Black Hills National Forest

October 2023

# Existing Special and Potential Designated Areas

## Comments and Responses on Draft Assessment



Black Hills National Forest. (USFS 2021).

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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 existing special and potential designated areas 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>Many of the items under Need for Change won't involve forest plan direction. We recommend that you limit the items under Need for Change to those involving actual forest plan components.</p>	<p>Thank you for your comment. Plan revision and plan direction will develop throughout the plan revision process. The Need for Change in assessments are a useful place to start the discussion, but do not represent a proposed plan, nor plan direction. Revised plan direction will be based on significant public involvement which is forthcoming.</p>
<p>A commenter notes that assertions were made regarding private land degradation on page 15, and the commenter urged the Agency not to make assumptions regarding the current conditions on private lands.</p>	<p>Thank you for your comment. The statement was removed.</p>
<p>The cabins in Sunday Gulch are on the very edge of the Norbeck wildlife preserve in an area that is highly modified with roads, powerlines, previous logging, and a decades long presence of cabins.</p>	<p>Thank you for your comment. The Forest will present opportunities for the public to comment on environmental effects when a proposed action for plan direction is publicly scoped.</p>
<p>Warren Peak on the Bearlodge Ranger District is noted as a unique mountain grassland. It should be included here for consideration. Consider Warren Peak for a Botanical Area. This could also help some Species of Conservation Concern (SCC) habitat.</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion, but do not represent a proposed plan, nor plan direction. Revised plan direction will be based on significant public involvement which is forthcoming.</p>
<p>The essence of wilderness is to avoid all external impacts on humans and wildlife. The US Forest Service needs to make the Black Elk Wilderness a no-fly zone and exclude tourist helicopters and planes. It also needs to be active in improving conditions/scores identified on Table 2.</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion about impacts to the quality of wilderness character. However, the assessments do not propose new plan direction. Revised plan direction will be based on significant public involvement which is forthcoming.</p>

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<b>Comment</b>	<b>Responses</b>
<p>Centennial Trail, designated in 2005, provides a full range of non-motorized uses such as hiking, horseback-riding, and mountain biking along its 111 miles. However, when the Travel Management Plan was implemented in 2010, a 15-mile section between Pilot Knob and Dalton Lake was approved for ATV use. Because of the environmental and social damage that this motorized use has caused, this 15-mile segment must be restored to its original designation as non-motorized.</p>	<p>Revised plan direction will be based on significant public involvement which is forthcoming. Opportunities to comment on proposed desired recreation settings will be presented at that time. However, site-specific proposals to change routes on the motor vehicle use map must follow travel management regulations (36 CFR 212) and are outside the scope of the plan revision.</p>
<p>Flume Trail, Lost Cabin Trail, and George S. Mickelson Trail are popular routes for locals and tourists and must all be maintained as non-motorized.</p>	<p>Revised plan direction will be based on significant public involvement which is forthcoming. Opportunities to comment on proposed desired recreation settings will be presented at that time. However, site-specific proposals to change routes on the motor vehicle use map must follow travel management regulations (36 CFR 212) and are outside the scope of the plan revision.</p>
<p>We recommend addition of “Botany Canyon – South Fork of Stagebarn Canyon” to this list of botanical areas. In response to a public presentation by Becci Rowe (Norbeck Society) in 2005 describing the character of Botany Canyon and threats from ATV use, Forest Supervisor Brad Exton designated the canyon as closed to motorized travel. The Norbeck Society has documented more than 100 botanical species along this spring-fed drainage, making this a unique ecosystem worthy of special designation. Botany Canyon also contains large quantities of Trentepohlia algae, a very rare, if not solitary, occurrence in the Black Hills.</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion about botanical areas. However, assessments do not represent a proposed plan, nor plan direction. Environmental effects will be based on proposed plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>

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<b>Comment</b>	<b>Responses</b>
<p>We recommend addition of “Jim Creek Area” to this list of Botanical Areas due to its exemplary diversity of non-vascular species supported by a variety of habitats</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion about botanical areas. However, assessments do not represent a proposed plan, nor plan direction. Environmental effects will be based on proposed plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>
<p>The eight areas identified in Table 5 Botanical Areas within the Black Hills National Forest should be further assessed and established as botanical areas.</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion about botanical areas. However, assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>
<p>All areas of wetland should be assessed for inclusion as botanical areas so that grazing and off-road use are prohibited.</p>	<p>Thank you for your comment. The assessments are a useful place to start the discussion about botanical areas. However, assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>
<p>Non-roaded riparian areas that are one mile or greater in length should be considered for extra protections.</p>	<p>Thank you for your comment. The assessments are a useful place to start discussions about riparian management, however, assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>
<p>Please continue the exclusion of motorized travel for the Swede Gulch/Tillson Creek drainages and adjacent areas that fall within the boundaries shown on your 2022 Vehicle Use Map, Northern Hills Ranger District.</p>	<p>Thank you for your comment. The assessments are a useful place to being discussions, however, assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and the Forest Service looks forward to your input on these areas during the analysis.</p>

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<b>Comment</b>	<b>Responses</b>
<p>The Norbeck Society was established in 2005 over concerns about unrestricted motorized travel in the Black Hills National Forest. As our contribution to the Black Hills National Forest development of a Travel Management Plan, we propose a number of areas that should be protected from motorized travel.</p>	<p>Thank you for your comment. The assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and we encourage you to participate and present information on these areas during the plan revision process.</p>
<p>"Inyan Kara Mountain" is referred to as "Inyan Kaqa Mountain" on page 8 and is consistently misspelled throughout.</p>	<p>The spelling "Inyan Kaga" is a reflection of the original Cheyenne word where "kaga" refers to one who "makes, creates, or imitates". "Kara" represents a corrupted form of the word "kaga" (Sundstrom 1997).</p>
<p>It should be recognized in the assessment that Inyan Kara Mountain is a 1400-acre site that is surrounded by private land and public access is limited with no permanent right-of-way access secured by the Forest Service.</p>	<p>The following statement can be found under the section Potential Wilderness Area Inventory Results: "Inyan Kaga, is less than 5,000 acres. Inyan Kaga was included due to its isolation, remoteness, and inaccessibility." In Table 4. Roadless Areas within the Black Hills National Forest Inyan Kaga is described as totaling 1,397 acres.</p>
<p>The Hay Creek Research Natural Area (RNA) is described as a 577-acre plot in the north Bear Lodge area, however the site has never been used as it is required to be defined as an RNA and the stated acreage is arbitrary as the site has never been surveyed to identify a boundary.</p>	<p>Direction was given in the 2005 Forest Plan Amendment that establishment records be prepared for Hay Creek RNA and although it is acknowledged that the acreage is approximate, it is only subject to minor variation. The assessment is consistent with this direction.</p>

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<b>Comment</b>	<b>Responses</b>
<p>The description for the Hay Creek RNA is inaccurate. Although described as being managed for watershed protection, wildlife habitat and recreation, a lack of management has led this area to be at high risk for fire and spreading to adjacent State and private lands. More information should be included in the assessment acknowledging active management prescriptions along with any historical information that these actions have been carried out in compliance with the objectives of the RNA designation.</p>	<p>Thank you for your comment. We look forward to engaging the public on the Hay Creek RNA throughout the plan revision process to get a better idea the condition and effects on adjacent lands.</p>
<p>Opposition exists to designating areas as RNAs; however vegetation treatments are recommended and could be accomplished through cooperative agreements.</p>	<p>Thank you for your comment. The assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and we encourage you to participate in that process and welcome the prospect of working cooperatively with other organizations.</p>
<p>Recommend additional information be added regarding the Sand Creek Inventoried Roadless Area, including information on current vegetative conditions, roads, and recreational opportunities.</p>	<p>Sand Creek Roadless Area is identified in the assessment as containing 9,950 acres. All Inventoried Roadless Areas (IRAs) are managed according to provisions of the 2001 Roadless Rule that prohibit tree cutting, road construction, and road reconstruction, with some exceptions to each of these prohibitions.</p>
<p>It is unclear which rivers were found to be Eligible in the Bearlodge Ranger District, please provide a map showing their locations. More detail is required for how the Forest Service evaluated Wild and Scenic Rivers, and it is unclear how the Forest Service is following the process as outlined in Forest Service Handbook 1909.12.</p>	<p>Thank you for your comment. The wild and scenic river evaluation process will continue throughout the plan revision process. We look forward to working with stakeholders and the public to better understand characteristics of potential eligibility. Additional information can be found in the Wild and Scenic Rivers Assessment. Within that assessment, Appendix A, Chapter II, Table 6 lists the segments of Beaver Creek and Sand Creek with their recommended classification status, as well as a map of segment locations.</p>



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<b>Comment</b>	<b>Responses</b>
<p>There is opposition to designating any new areas as Wilderness and when legally feasible, special designation/management areas should be eliminated. In addition, restrictive management of roadless areas should be discouraged and multiple uses should instead be allowed.</p> <p>Areas identified as proposed Wilderness and in particular, Inyan Kara Mountain and the Sand Creek Inventoried Roadless Area, warrant further evaluation based on direction from Forest Service Handbook 1909.12.</p>	<p>The assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and we encourage you to participate in that process.</p> <p>As noted in the section Potential Wilderness Area Inventory Results, the process for evaluating an area for Wilderness characteristics is defined in the Wilderness Act of 1964 and Forest Service Handbook 1909.12. This is an ongoing process and both the Inyan Kaga Mountain and Sand Creek Inventoried Roadless Area, as well as any additional suitable areas, will undergo further evaluation. Additional information can be found in the Potential Wilderness Inventory Assessment.</p>
<p>The Black Hills National Forest should coordinate with surrounding counties as early as possible when considering the designation of new special designation areas, including Areas of Critical Environmental Concern (ACEC), Wild and Scenic Rivers, National Monuments, Wilderness and Wilderness Study Areas (WSA), Inventoried Roadless Areas and Lands with Wilderness Characteristics (LWCs).</p> <p>In addition, management of special designation areas should be coordinated with surrounding counties.</p>	<p>Thank you for your comment. The assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and we encourage you to participate in that process and welcome coordination from surrounding county governments.</p>
<p>Nearly every acre of the Black Hills National Forest has been logged at least once and most areas have been logged repeatedly. Very little of this National Forest remains in a primitive or even semi-primitive condition. There are virtually no roadless lands left, and only about 1% of the entire Forest is designated as Wilderness.</p>	<p>The assessments do not represent a proposed plan, nor plan direction. Significant public involvement will be forthcoming, and we encourage you to participate in that process.</p>

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<b>Comment</b>	<b>Responses</b>
<p>Please consider Hell Canyon as a potential designated special area. It has multiple significant values including scenic, archaeological, old growth timber, wildlife habitat and recreational opportunities.</p>	<p>Thank you for your comment. The assessments do not represent a proposed plan, nor plan direction. However, significant public involvement will be forthcoming, and we would welcome your input on this issue during that process.</p>
<p>Propose creating an area between Highway 16 and Custer Limestone Road, and from Lightning Creek Road to Mud Springs Road that retains a primitive condition, is non-motorized, and managed for non-motorized recreational opportunities. This action supported by numerous organizations and the general public.</p>	<p>Thank you for your comment. The assessments do not represent a proposed plan, nor plan direction. However, significant public involvement will be forthcoming, and we would welcome your input on this issue during that process.</p>