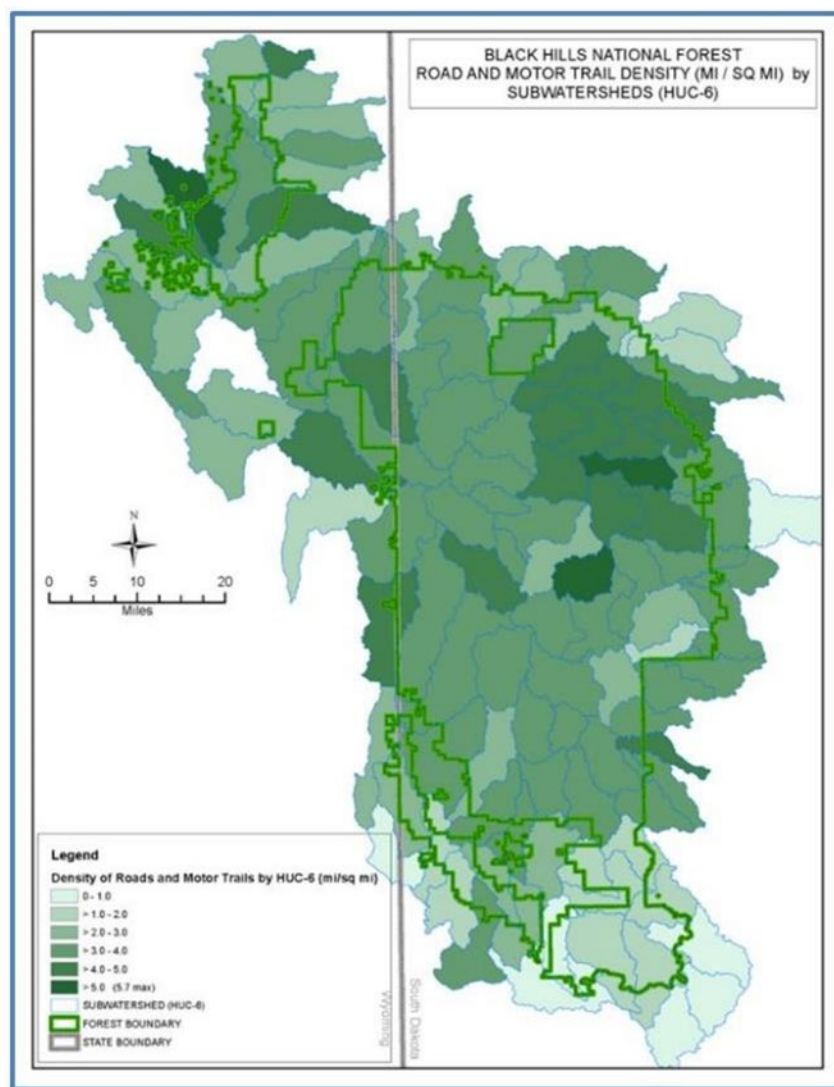


# Infrastructure

## Comments and Responses on Draft Assessment



Road and motor trail density by subwatershed, Black Hills National Forest

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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 infrastructure 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>Foremost is that the Black Hills National Forest has, perhaps, the nation's highest, greatest numbers, of at-risk dams subject to failure in the national forest system. Dam failures kill people. This occurs on, and off Forest Service lands. The history is too often ignored or minimized. This assessment should have documented necessary maintenance priorities, repairs, and even a decommissioning schedule. Many of the earth dams on the Black Hills National Forest are of doubtful sustainability. The deadly Rapid City flood was exacerbated with an unusual rainfall that contributed to a breached earthen dam. Climate change is contributing to rainfall events of greater precipitation and duration. The earthen dams are not strengthening themselves, and a Black Hills National Forest early warning system for floods is non-existent, save for Cook Lake, Wyoming.</p>	<p>The Forest Service agrees with the comment and has added an action category to the recommendations to be carried forward in the Plan.</p>
<p>The assessment notes the very high road and trail density on the Black Hills National Forest compared to other national forests. In listing the environmental impacts of these roads and their use that need to be considered in the revised forest plan, the negative affect on the energy balance, especially of wintering wildlife from disturbance and displacement by road use is not addressed. Rather, reference is simply made to road use causing behavioral changes in wildlife. The Department recommends inclusion of more detail in relation to how wildlife behavior is impacted or changed as a result of road use, and identification of appropriate mitigation, for example through spatial and timing buffers from high-value wildlife areas, sound mitigation, etc.</p>	<p>The impacts of the road network, and in particular the effects to wildlife and any needed standards or guidelines will be addressed in the Plan and the Environmental Impact Statement (EIS) that accompanies the Plan.</p>
<p>The Department recommends that within the section: Chapter 5. Potential Need for Plan Changes to Respond to Infrastructure Issues, a statement is included to the effect that there are many hydrologically connected roads which are a detriment to stream and riparian health, these roads should be prioritized for rerouting, if possible, to minimize the number of instances in which roads are crossing streams.</p>	<p>The comment accurately reflects forest road and riparian conditions. The impacts of the road network, and in particular the effects to wildlife and any needed standards or guidelines will be addressed in the Plan and the EIS that accompanies the Plan.</p>

<b>Comment</b>	<b>Responses</b>
<p>The Department recommends that infrastructure is located no less than 500 feet from aquatic features and riparian areas whenever possible. Concern: Non-system Roads on the Black Hills National Forest-Overall this assessment does not include impacts to grazing permittees or rangeland.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>• Include a section on livestock grazing under "Uses and Benefits."</li> <li>• Under Environmental Impacts and Effects of Roads include the following: <ul style="list-style-type: none"> <li>• Increased motorized conflicts between operators and livestock, i.e., collisions.</li> <li>• Loss of rangeland and forage</li> <li>• Alterations of rangeland due to recreational and other activities, i.e., spread of noxious and invasive weeds, rangeland degradation, increased soil erosion, etc.</li> </ul> </li> <li>• Under resource roads include: <ul style="list-style-type: none"> <li>• Harassment of livestock</li> <li>• Negative impacts to livestock infrastructure: cut and damaged fencing, open gates, vandalism to water infrastructure, i.e., tanks, pipelines, and small dams.</li> </ul> </li> </ul>	<p>The suggestion to locate infrastructure no less than 500 feet from water features could be considered during resource analyses for Land Resource Management Plan (LRMP) revision and potential inclusion as a future Forest Plan Standard or Guideline measure. However, development of plan direction will be undertaken during the next steps of the plan revision process. Opportunities to propose new standards or guidelines will be presented during scoping as the agency begins environmental analysis for the revised plan.</p>
<p>Loss of revenue from timber sales due to lack of timber to sell has added to the loss of funds for infrastructure upkeep. Roads constructed for the timber industry are not always closed and lack of rehabilitation leaves weeds, soil disruption, and runoff that impacts water resources.</p>	<p>This is a widely recognized financial issue and is prominent in the assessment. Transportation analysis and related documents and will be further considered in the LRMP process. The Forest prioritizes available funds based on transportation needs and environmental effects to wildlife, water, and other valued resources.</p>

<b>Comment</b>	<b>Responses</b>
<p>2007 Transportation Analysis: The overall level of federal funding and timber purchaser expenditures is not sufficient to perform the short- and long-term maintenance needs identified for National Forest System (NFS) roads in general.” Black Hills National Forest has more roads than most national forests of similar size. Without more funding the long-term condition of Black Hills National Forest roads is expected to deteriorate. Larger and more destructive storms in the future will cause even more damage."</p>	<p>Transportation analysis and related documents and will be further considered in the LRMP process. The Forest prioritizes available funds based on transportation needs and environmental effects to wildlife, water, and other valued resources.</p>
<p>Roads cause a great many environmental concerns. The fewer the roads the better. Inventory of all roads and closure of non-Forest Service roads and trails must be a priority so there are not so many roads and trails to monitor and maintain. Bigger is not always better. Example: Let the commercial campgrounds take on the big rigs out there today. The Forest Service does not have the money to build bigger sites that would impact more habitats</p>	<p>Environmental effects of roads are of high concern to the Forest Service and are balanced with transportation needs. High-impact and low utility roads are typically the lowest priority, while high impact and high utility roads are prioritized for upgrading and storm-proofing.</p>
<p>Do what needs to be done within the funding limits of the Forest Service. If roads and sites have to be closed and the public gets up in arms about it, they will contact their representatives whose recourse is to provide more funding.</p>	<p>Limited funding is a significant challenge to Forest management and requires careful priority setting to ensure funds are expended effectively and efficiently.</p>
<p>A commenter noted an error in a statement: "Earlier spring flows from snowmelt and glacier fed rivers are very likely."</p>	<p>The erroneous statement in the assessment was corrected. The Forest’s rivers and streams are not affected by glaciers, although snow has a large influence.</p>
<p>The Crook County Natural Resource Management Plan (dated December 2, 2020, Photo Book 617, page 198-199, 211-212) includes the following and the Forest Service should be as consistent with their management prescriptions as allowed by law:</p> <ul style="list-style-type: none"> <li>• Priority #1 (page 198) - Federal agencies should support designation of all currently open motorized and nonmotorized trails, rights-of-way, and roads as open transportation networks.</li> </ul>	<p>Financial constraints are significant and may require that some roads are not maintained or receive minimal maintenance.</p>

<b>Comment</b>	<b>Responses</b>
<p>(Continued from previous page)</p> <ul style="list-style-type: none"> <li>• Priority #B (page 198) -- Roads on federal lands shall remain open to provide for the economic benefit, use, and safety of the public. Where road closures are proposed, specific justification for the proposal shall be given on a case-by-case basis, and the proposal shall be discussed in coordination with Crook County.</li> <li>• Priority #10 (page 198) - Federal agencies should expedite beneficial land exchanges that seek to provide public access to landlocked federal lands.</li> <li>• Priority#11(page 198) –Unfettered access through federal lands for emergency services and law enforcement shall be granted.</li> <li>• Priority #14 (page 199) -- Federal agencies should support access on federal lands for development and maintenance of communication infrastructure.</li> <li>• Priority #1 (page 211) - Federal agencies should proactively identify potential land exchanges and conduct analysis on lands for disposal that will consolidate land ownership type and reduce federal land from being isolated from other public lands.</li> <li>• Priority #2 (page211) - Federal agencies should prioritize land exchanges in areas where there may be resource or management conflicts between the federal managers and the neighboring private or state landowners.</li> <li>• Priority #3 (page 211) - Voluntary land exchanges and/or other similar programs should be pursued as a primary way to encourage access to landlocked federal public lands as opposed to the use of eminent domain or other involuntary methods.</li> <li>• Priority #4 (page 212) - Federal agencies should attempt to consolidate and combine land exchanges, when possible, to reduce overall costs. However, such consolidations should not be at the expense of causing undue delay on smaller land exchange proposals</li> </ul>	<p>(Continued from previous page)</p> <p>The Forest Service will work with the county and other stakeholders to define transportation needs to inform priority setting, ongoing maintenance, and improvement work.</p>