



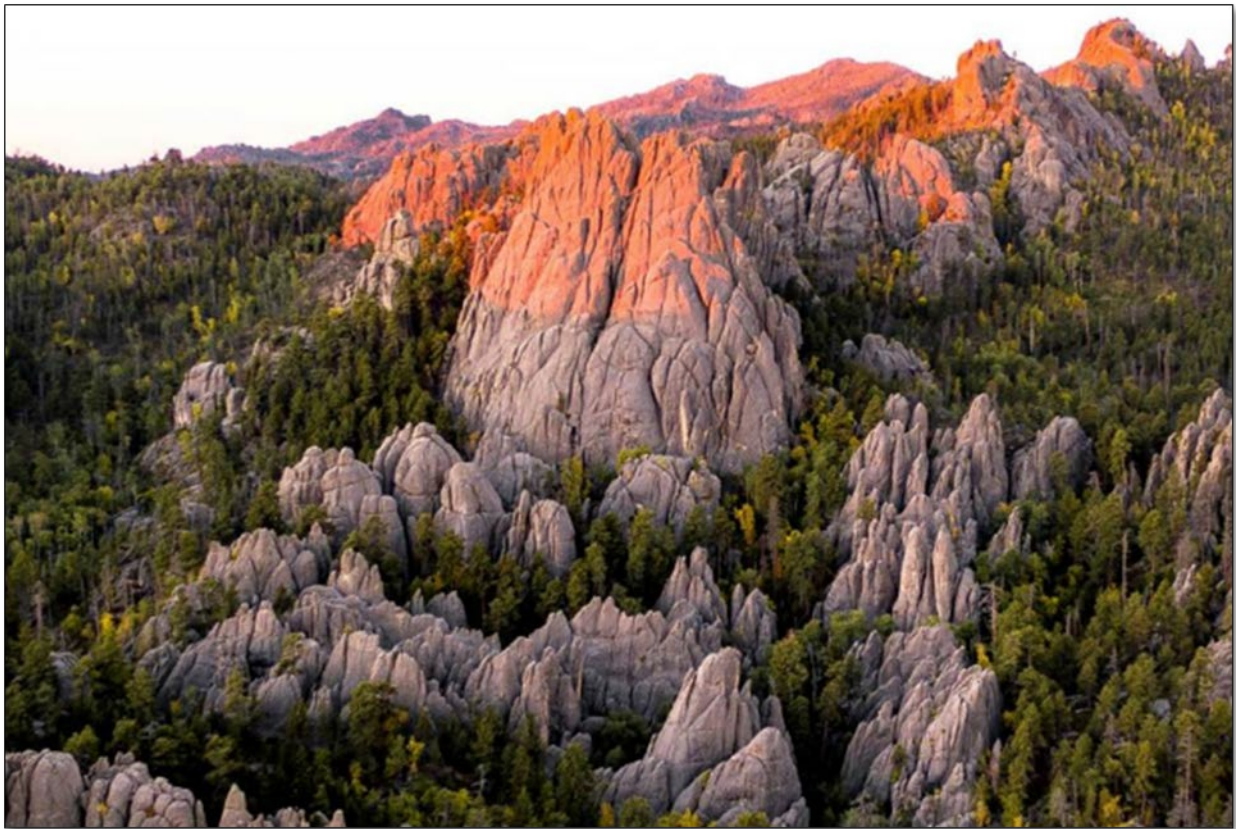
Forest Service  
U.S. DEPARTMENT OF AGRICULTURE

Rocky Mountain Region / Black Hills National Forest

October 2023

# Recreation Settings, Opportunities and Scenic Character

## Comments and Responses on Draft Assessment



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 recreation and scenery 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>It is unclear from the assessments what forest’s recreation priorities are.</p>	<p>The focus of the assessment for recreation is to identify and evaluate available information about existing conditions, trends and sustainability of recreation settings, opportunities, uses, preferences, access, and scenic character across the broader landscape. Using the Recreation Opportunity Spectrum (ROS) and the Scenery Management System, the Responsible Official assesses the extent to which the plan area meets the demand for recreational opportunities and the ability of the plan area to sustain these recreation settings, opportunities, access, and scenic character.</p>
<p>Assessments should recognize off highway vehicles (OHV) keep getting bigger. They create noise, dust, ruts, and erosion, and scare wildlife. Hikers avoid some trails because OHVs are such a disturbance and/or firearm use is common in those areas. It simply is not safe or enjoyable.</p>	<p>Larger OHV widths and lengths are discussed in the “Preferences by Activity” section of the Recreation Assessment, and conflicting uses are discussed in the “Trail Incompatibilities” section. 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>Assessment should recognize some FS gates adjacent to residences permit OHVs due to the disturbance that brings to residents.</p>	<p>Discussion pertaining to the relationship between residents and OHVs is located under the Privately Provided Recreation Opportunities on the Black Hills National Forest.</p>
<p>The assessments should recognize the impacts that vendors play in renting UTVs.</p>	<p>In response to comment, discussion was added under "Current Condition and Trend" and "Motorized Trails and Primitive Roads."</p>

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<b>Comment</b>	<b>Responses</b>
<p>OHVs are becoming wider, heavier, longer, and more powerful. The average side-by-side sold is now larger than 62". Many trails on the Forest restrict widths, allowing only 50" or less or 62" or less vehicles. Some commenters wanted less width restrictions to allow larger vehicles on these trails. Other commenters noted increasing impacts to resources and trails and urged more width restrictions. Some commenters asked for restrictions on engine sizes to reduce impacts and weight.</p>	<p>Motorized trails are displayed on the Motor Vehicle Use Map and designated under the Travel Management Rule (36 CFR 212). Changes to the current designations would require analysis at the project level to analyze each specific route and the impact that would occur from widening the trails. Currently, over 600 miles of motorized routes, including trails and forest roads, are open to OHVs over 62" (Table 10, Recreation Assessment).</p> <p>Although, the assessment identifies and discusses the issue, the revised forest plan does not make site-specific changes to motorized designations. Under the 2012 Planning Rule, the forest plan uses the Recreation Opportunity Spectrum and Scenery Management System to allocate settings to meet the demand for recreational opportunities and the ability of the plan area to sustain these recreation settings, opportunities, access, and scenic character.</p>
<p>Commenters suggested evaluating and changing user fees on the Forest, including ideas such as charging higher fees for out-of-state visitors.</p>	<p>The Forest Service collects fees under the authority of the Federal Lands Recreation Enhancement Act (FLREA; 16 U.S.C. §§6801-6814). Changing or proposing new user fees under FLREA would be a separate process undertaken outside of plan revision.</p>
<p>A comment suggested adding more "Trails Open to All" and "Extreme Difficulty" routes.</p>	<p>Discussion of new trail routes is included under Preferences By Activity - Motorized Vehicles. In order to add "extremely difficult" routes, new trails would need to be proposed and analyzed at a site-specific level subject to travel management regulations. "Trails open to all vehicles" is a current classification on the MVUM, which simply indicates that vehicles allowed on these routes are not subject to width restrictions such as "Trails open to vehicles 50" or less."</p>
<p>A comment stated that the assessment should evaluate or consider better signs to guide users.</p>	<p>Signage and other infrastructure are addressed in the Infrastructure Assessment. Detailed guidance regarding Agency signage is contained in Engineering Manual 7100-15.</p>
<p>OHV and Snowmobile recreation should be looked at very differently because in many ways they are so different.</p>	<p>Information was added to the assessment to discuss over-snow recreation. In areas that have seasonal variation and designated routes or area for motorized over-snow vehicles to use, a need to model winter ROS was identified in the Recreation Assessment.</p>

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<b>Comment</b>	<b>Responses</b>
<p>We recommend adding the following to the Need for Change:</p> <p>-Addition of management strategies to identify alternative routes for snowmobile trails considering new development and subdivisions on private lands with year-round access.</p>	<p>Information was added to the assessment to discuss over-snow recreation. In areas that have seasonal variation and designated routes or area for motorized over-snow vehicles to use, a need to model winter ROS was identified in the Recreation Assessment. Plan direction to manage desired recreation settings will be forthcoming as the Forest develops a proposed action and enters the environmental analysis stage.</p>
<p>A variety of comments were submitted urging the Forest Service to put more restrictions on motorized trails and create some higher quality non-motorized areas and trails. Some comments were requests to look at the entire Forest’s non-motorized opportunities, and other comments were specific to trails such as the Centennial Trail. Another comment elaborated that the concept behind the Shanks Quarry Multiple Use trail system should be replicated to provide more balanced opportunities.</p>	<p>Site-specific proposals to change the motorized trail system are subject to travel management regulations (36 CFR 212) and are project-level decisions, outside the scope of this analysis. However, the forthcoming proposed action and subsequent analysis for the plan’s revision will provide opportunities for the public to comment on the Forest’s desired recreation settings. The Agency will establish plan direction for desired recreation settings to manage motorized and non-motorized recreation across the landscape under the 2012 Planning Rule. This will provide a framework to guide future project-level decisions such as travel management decisions.</p>
<p>A variety of comments were submitted urging the Forest Service to create more motorized trails and create some higher-quality motorized areas and trails, claiming motorized opportunities would be of higher quality if people disperse more. Some comments were specifically requesting loops.</p>	<p>Site-specific proposals to change the motorized trail system are subject to travel management regulations (36 CFR 212) and are project-level decisions, outside the scope of this analysis. However, the forthcoming proposed action and subsequent analysis for the plan’s revision will provide opportunities for the public to comment on the Forest’s desired recreation settings. The Agency will establish plan direction for desired recreation settings to manage motorized and non-motorized recreation across the landscape under the 2012 Planning Rule. This will provide a framework to guide future project-level decisions such as travel management decisions.</p>

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<b>Comment</b>	<b>Responses</b>
<p>The Forest received multiple comments regarding visitor capacity. Some comments questioned how the Agency establishes capacity, others urged that the Agency restrict users to provide a better experience, while others urged more opportunities and higher capacities to accommodate growing uses.</p>	<p>User capacity is based on PAOTs, which refers to Persons-At-One-Time. This number is generated different ways due to the recreational areas and/or site usage. As an example, a developed campground is measured according to the number of campsites available, multiplied by five persons at each campsite. Five persons per campsite is a standard used by the Forest Service for campgrounds, as well as picnic areas with individual picnic tables, grills, etc.</p> <p>With respect to trailheads, interpretive wayside exhibits, fishing platforms, and other recreational areas without a defined space for users, the number is often based on the parking capacity at the site. If the parking lot is striped, the number of parking spaces multiplied by a multiplier of sorts determines the PAOTs for that particular area. If the parking lot is not striped, the spatial area (square footage) often determines the number of PAOTs based on a reasonable number of vehicles in the parking lot, once again multiplied by an established multiplier.</p> <p>On a broader scale in the Forest Plan, the Agency manages recreation opportunities by creating plan direction for desired recreation settings. These settings range from primitive, where a person should not see much human activity at all, to urban, where a person might order a meal at a restaurant after enjoying the Forest. The Forest Service will develop plan direction during the revision process and provide input opportunities to the public to create a balance of desired recreation settings.</p>
<p>Comments noted the expected population growth of the plan area and some impacts that would occur as a result.</p>	<p>Discussion of increasing population growth and demand was added under Black Hills National Forest Recreation Demand and Preferences – Visitation.</p>
<p>There is an active group in Hill City that is working with Pennington County and the South Dakota Game Fish and Parks on developing numerous trail systems around the Hill City area. One concept depicts a trail from Sheridan Lake to Hill City. They published a very detailed book that shows the economic value, rough cost estimates, difficulty, and so on. This information should be included.</p>	<p>Information was added to the subsection, Local Recreation Groups, – Action of Others.</p>

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<b>Comment</b>	<b>Responses</b>
<p>Under the Preferences By Activity heading, the E-Biking paragraph should mention the difference between a class 1,2, and 3 e-bikes.</p>	<p>In response to the comment, the clarification was added.</p>
<p>Private Land Development – The Black Hills National Forest is surrounded by and intermingled with parcels of private land. The forest plan does not regulate private lands, but the private land development affects the settings that can be provided on adjacent National Forest System lands. Private land within the forest boundary is being developed, which results in changes to the setting. As these lands continue to be developed in the future, the character of the Forest will continue to change (USDA Forest Service 2021). Continue working with county government relative to their individual comprehensive plans so that the future landscape of the forest aligns with private, federal, and county concepts.</p>	<p>Discussion is included under Action of Others – State and Local Plans.</p>
<p>We recommend that the United States Forest Service (USFS) use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states: “Public land visitation data collected from the Department’s bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large.”</p>	<p>Discussion was added under Barriers to Recreation Opportunities for Minority and Under-Represented Groups.</p>



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<b>Comment</b>	<b>Responses</b>
<p>We are concerned that closing dispersed camping options will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance.</p> <p>Another issue is those who make reservations and don't show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. The USFS should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system.</p>	<p>Discussion was added under Barriers to Recreation Opportunities for Minority and Under-Represented Groups.</p>
<p>Our members often include responsible observation and appreciation of cultural resources as a reason to explore public lands. For this reason, we don't think the presence of cultural resource sites should be the primary justification for any closures. Instead of closures, USFS should invite the BlueRibbon Coalition (BRC) and other recreation-focused stakeholders to participate in the planning process and Section 106 consulting partners to ensure that all management tools are explored for preventing impacts to cultural resource sites.</p>	<p>Discussion was added under "Preferences by Activity" - "Sacred Site Access."</p>
<p>In addition to the broad discussion on disability access we already mentioned, USFS should analyze what percentage of the neighboring tribal population includes members with mobility Sharetrails.org – it's what we do!</p>	<p>Discussion was added under Barriers to Recreation Opportunities for Minority and Under-Represented Groups.</p>

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<b>Comment</b>	<b>Responses</b>
<p>A variety of comments were received related to increasing the use of volunteers, partnerships, and other methods for managing recreation, trails, and wilderness. Current volunteer/partnership programs and the recent expansions of these efforts have proven to be beneficial. Developing strategies to continue this and create new ways of managing the Forest and maintaining recreation amenities are needed.</p>	<p>Thank you for your comment. The Forest continues its commitment to increase the presence of volunteers and partners to aid in its management of trails, recreation, and wilderness. Opportunities will be forthcoming to comment on plan direction that would lend to achieving these goals.</p>
<p>A commenter opined that the What If? section does not belong the assessment, adding that it was speculation and opinion of the author(s).</p>	<p>In response to comment, the What If section was removed from the assessment.</p>
<p>Comments urged the Forest Service to continue working with county and state government relative to their individual comprehensive plans and regulations so that the future landscape of the forest aligns with private, federal, state, and county concepts.</p>	<p>The Forest Service appreciates the comment and looks forward to working with surrounding entities during the forthcoming plan revision process. Discussion of surrounding lands and jurisdictions is included under Action of Others – State and Local Plans.</p>
<p>The Forest received a lot of comments about issues in specific areas caused by motorized recreation. Examples include the Pine Grove Trailhead, Box Elder Campground, and Centennial Trail 89.</p>	<p>Thank you for your comment. Opportunity to comment on plan direction to manage forest-wide recreation issues will be forthcoming. Site-specific proposals to manage a trailhead differently would be a project-level action outside of the scope of the forest plan.</p>
<p>A commenter asked for more discussion about impacts from all-terrain vehicles (ATVs) such as impacts to pets, dust, and other types of incompatibilities.</p>	<p>In response to the comment, discussion was added to the Trail Incompatibilities section of the assessment.</p>

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<b>Comment</b>	<b>Responses</b>
<p>Multiple comments noted the impacts that increased recreation use is having on livestock and range permittees. They urged further analysis of the issue and plan direction including concepts such as use limits.</p>	<p>The range and recreation assessments have been edited to better identify the impacts recreational use has on livestock grazing management. In the recreation assessment, discussion was added to the subsection Multiuse Management added under Potential Need for Change – Spatial Layout and Popularity. The effects of other forest uses on rangeland management will be further discussed during the environmental analysis and plan development phase. Opportunities for the public to comment on proposed direction will occur during these subsequent steps.</p>
<p>Multiple commenters had questions about the OHV fee program, collection of money, and how the money is spent.</p>	<p>The OHV sticker program funds the motorized trail program on the Black Hills National Forest in Wyoming and South Dakota using different mechanisms. 95% Fees collected for the Motorized Trail Permits in South Dakota go into a special fund that by law can only be spent to benefit the program for which the fees were collected. The other 5% stays with the Regional Office. At this time that fund pays for 100% salaries, vehicles, equipment, supplies, and contracts associated with the Motorized Trail Program. Funds are used to sell permits, patrol, educate visitors, and maintain and construct trails. In Wyoming, the Motorized Trail System is a state system. Fees are collected by the State of Wyoming and then distributed to the Forest, similar to the snowmobile System in South Dakota.</p>
<p>Comments urged the Forest to address impacts of helicopter tours flying over the Black Elk Wilderness and degrading solitude.</p>	<p>Discussion of helicopter flights was added under Privately Provided Recreation Opportunities on the Black Hills National Forest – Outfitters and Guides. The analysis of impacts of recreation activities will be forthcoming after plan direction is developed. The public will be provided with opportunities to comment on the proposed action’s impacts when the environmental analysis begins.</p>
<p>The Forest received multiple comments regarding National Visitor Use Monitoring data used in the assessments. Some noted apparent inaccuracies and questioned the use of the data.</p>	<p>The National Visitor Use Monitoring System produces visitation statistics for all National Forest System Lands. Data is validated at a landscape level using national standards, and policy directs the use of the data across the Agency for consistency. More information can be found at <a href="https://www.fs.usda.gov/about-agency/nvum">https://www.fs.usda.gov/about-agency/nvum</a>.</p>
<p>A commenter asked the Agency to address noise pollution from generators.</p>	<p>Generator noise is discussed under Preferences By Activity – RV Camping.</p>