

Rocky Mountain Region / Black Hills National Forest

## **Socioeconomics**

Custer, Fall River, Lawrence, Meade, and Pennington Counties, South Dakota Crook and Weston Counties, Wyoming

**Comments and Responses on Draft Assessment** 



In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov. USDA is an equal opportunity provider, employer, and lender.

## **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 socioeconomics 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 committment 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
Assessment should look at number of Off Highway Vehicle (OHV) trail passes sold annually. Comment suggests that passes have increased by 39%, based on a Norbeck presentation in 2021.	Motorized Vehicle Use Trail Permit data was added to the assessment for 2011 to 2021.
Note that motorized trail system permit sales totaled \$5,222,660 between 2011 - 2021.	Motorized Vehicle Use Trail Permit data was added to the assessment for 2011 to 2021.
Assessment should further explain more aspects of outdoor recreation having a larger economic impact than timber, grazing, and minerals combined.	See section, Forest Contributions to Social and Economic Sustainability, for this info. No changes necessary.
Assessment should recognize The Bureau of Economic Analysis shows outdoor recreation brought in \$459 billion in 2019.	The Black Hills Socioeconomics Assessment is specific to activities in and around the Black Hills National Forest and the economic contributions from those activities. No changes made.
Assessment should recognize high fuel prices and elastic/inelastic of demand (commenter suggests he will still travel despite high fuel prices).	Thank you for your comment. No changes necessary to the revised assessment. However, we do recognize that fuel prices often impact personal decisions on recreational preferences.
Assessment should relook at the Environmental Justice (EJ) statement about no circumstances to address EJ because of county minority population. Ignores Native American population that have been excluded and live on reservations.	While effects to EJ populations are not relevant for the assessment phase, the assessment acknowledges "There are several Tribes affiliated with the Black Hills National Forest area of influence due to the historical and traditional cultural connections to the resources and landscape of this area. Tribes that may have concerns about potential Forest Service management practices and decisions and their effects on resources, uses, or areas of cultural importance would be considered as environmental justice populations as well." See the Cultural and Heritage Resources and the Areas of Tribal Importance assessments for more information.

Comment	Responses
Assessment should go into more detail on how economic diversity could be achieved. (NOTE: possibly could suggest a DC in the need for change section)	Revised assessment Potential Needs for Change section to add: "Consider plan direction to support diverse economic contributions from the forest's multiple uses."
Assessment could describe in more detail the difference between the 15,725 jobs created by tourism and the 937 (2018, USFS) jobs created by timber industry. Recognize that statewide, tourism accounts for over 54,000 jobs and contributes 4.4 billion to state economy (Kaufman 2021). Could continued harvest levels threaten this economic impact (will people travel to Black Hills National Forest if we keep removing trees and impacting the landscape)?	The Black Hills Socioeconomics Assessment is specific to activities in and around the Black Hills National Forest and the economic contributions from those activities. The estimated number of jobs and income created by different program areas, including timber and tourism, can be found in Table 10. In addition, the assessment identifies the need to "manage for resilient ecosystems so that forest resources can continue to contribute to social and economic values."
13.5 million annual visitors to South Dakota travel to the Black Hills (Kaufman 2021).	US Forest Service (FS) uses National Visitor Use Monitoring data for visitation estimates and assessment includes "620,000 annual visits to the Black Hills National Forest in 2019."
Look at Crook County Natural Resource Management Plan (2020) for information to be incorporated into the socioeconomics assessment.	Thank you for your comment. Where there is no specific information suggested, no changes were made to the assessment.
Assessment should expand on importance of livestock, timber, mining as important to Crook County; counties are an appropriate level for this type of analysis.	Added percent of timber-related employment in Crook County (1.7%) to assessment. Grazing and minerals employment in the area were minimal so emphasis not necessary. Economic contributions from the Black Hills are based on the seven-county analysis area. See section, Methods for Economic Contribution Analysis, for more details.
Assessment should recognize the importance of broadband to rural communities, such as those in Crook County and reference EO 1382128 (January 2019) to expedite rural access to broadband services. Agencies should be reducing barriers for this.	This doesn't seem relevant for the assessment. This could be considered during Plan development if the Forest Service has authority to influence the provision of broadband internet.

Comment	Responses
Assessment should further recognize hunting, trapping, shooting sports and the economic driver they offer to the area. Active vegetation management could improve these opportunities.	Hunting recreation use is addressed in the Outdoor Recreation and Wildlife section of the Socioeconomic Assessment.
Further explain statement "sustainability is a complex idea focused on intergenerational equity." How does this align with the definition of social sustainability?	Clarification made in Assessment. Changed to "Sustainability is the ability to maintain a condition over time."
Assessment could expand on agriculture contributions to counties (Fall River).	Table 5 shows the employment in the seven-county area by industry sector, including agriculture. The Forest Service contributions related to agriculture include forest products and grazing, and these are distributed across the area of influence (7 counties), depending on where permitees are located and where they spend their money.
Include a combined graph showing annual cut volume together with timber jobs for as far back as the USFS has reliable employment and harvest level records. Present timber jobs as a total instead of a percentage of total employment.	No changes necessary. Data is provided in separate graphs for the past 20 years. Relative employment is appropriate to capture overall changes to total employment.
Discuss the impacts of increased efficiency and automation at mill levels and how this might affect total number of jobs in that industry. Historically, over 100 mills operated on the Black Hills in early last century. Does this explain why volume cut has gone up, while timber-related jobs have gone down?	No changes necessary, as this information is already included. See section titled Timber-related Employment which states, "One potential reason for the decrease in timber-related employment is that the technology associated with the timber industry has changed to improve efficiency and automate processes."

Comment	Responses
The assessment should identify and evaluate available information about how timber harvest and production contribute to social, economic, and ecological sustainability (directed at timber assessment, but maybe an opportunity to cover more here).	This is addressed in section Forest Contributions to Social and Economic Sustainability. Added Timber harvest also contributes to a way of life for people in the area that have relied on Black Hills timber for generations.
The most recent Forest Service analysis of economic contributions from the Black Hills National Forest shows that timber harvest is, by far, the greatest economic contributor from the Black Hills National Forest, although recreation, grazing, and other uses of the Black Hills National Forest remain important.	Agreed. This is reflected in Table 9: Estimated jobs and income contributed by Black Hills National Forest program areas.
Compared to local and non-local recreation, combined, timber harvest activities contribute more than 3 times as many total jobs and more than 5 times the total labor income. We strongly recommend the Black Hills National Forest include the findings from the Forest Service report analyzing economic contributions from the Black Hills National Forest to local communities.	These referenced were 2016 jobs and income At a Glance reports, which have since been updated with 2019 resource data, modeling methodology, and IMPLAN data. Black Hills economic contributions provided in Table 9 are based on these updates.
Page 2 should include a discussion about mining area of influence.	The economic contribution analysis uses one area of influence to estimate economic contributions from each resource use, which is the sevencounty area defined on page 2.
Page 17 should include winter recreation contributions.	Added winter recreation activity use from NVUM to the section titled Outdoor Recreation and Wildlife.
In Mineral Production, please clarify if this includes split estates with subsurface federal mineral rights.	Confirmed in assessment that mineral production values do not include split estates. A footnote is included in the section Mineral Production.
Confirm that mineral production on split estates and other federal minerals are included in IMPLAN data inputs.	Confirmed in assessment that mineral production values do not include split estates and were not included in IMPLAN data inputs.
Look for opportunities to incorporate South Dakota board of tourism data.	Thank you for your comment. Where there is no specific information suggested, no changes were made to the assessment.