
Appendix D: Content Analysis for Travel Management Planning

Introduction

On November 9, 2005, the USDA Forest Service published in the *Federal Register*, Volume 70, No.216, the final rules and regulations for designating routes and areas for motor vehicle use for travel management activities (*hereafter referred to as* Final Rule) on National Forest System lands to become effective December 9, 2005.

Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System (NFS) roads are combined and clarified in this Final Rule as part 212, Travel Management, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (EO) 11644 (February 8, 1972), "Use of Off-Road Vehicles on the Public Lands," as amended by EO 11989 (May 24, 1977). These Executive orders direct Federal agencies to ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.

Black Hills Travel Management Planning

As a result of the publishing of the Final Rule, the Black Hills National Forest initiated the process to plan and designate routes, trails, and areas available for motor vehicle use. The Forest published a notice of intent (NOI) to prepare an environmental impact statement (EIS) in the *Federal Register*, Volume 72, No. 175, on September 11, 2007. The NOI initiated the scoping process for the environmental analysis (EA) for the Black Hills National Forest Travel Management Plan (*referred to as* Travel Management Plan) by identifying the purpose and need and a proposed action for the project. The notice also identified the responsible official, public involvement, schedule for public meetings, preliminary issues, and expected timeline for the analysis.

In addition to the *Federal Register* publication and news releases to local papers, the Black Hills sent to individuals, agencies, special interest groups, and other interested parties a letter describing the proposed action for designating motor vehicle use on the Black Hills National Forest, including a map of the proposal identifying specific routes, trails, and areas available for motor vehicle use. Larger scale maps were made available to the public through the District Office and Supervisor's Office of the Black Hills National Forest. Four public meetings were held to discuss the proposal and answer specific questions from the public. A comment form developed by the Black Hills National Forest was available to the public to encourage participation in the scoping process.

Summary Comments

During the scoping period, 738 responses were received from the public. The letters were received in three forms: Audubon Society form letter, some with individual comments; individual letters or e-mails; and the Black Hills National Forest OHV form, some with individual comments. Of the 738 letters sent; 60 were the Audubon form, including 14 letters containing no original comments or presented in duplicate from the sender; 217 individual letters, including 23 duplicates from sender; and 460 Black Hills OHV form, including 7 duplicates.

After reviewing the 738 letters, some 1,991 specific comments were identified and grouped. The comments were defined into 16 categories with sub-categories to improve the analysis of the comments

and define clear issue statements. A public concern statement was identified to describe each main category. These public concerns were then used to define issue statements. Issues represent conflicts posed by the proposed action, and are important because they can serve as the basis for alternatives.

The comment categories are summarized below, along with the disposition showing how they were incorporated into the EIS analysis.

Category 1: Add Motorized Routes (404 Comments)

Public Concern: The Forest Service should add trails, roads, and trailheads to the Travel Management Plan as presented by the public for motorized opportunities.

Sub-Categories:

- **Comments wanting ATV routes (25):** These comments focus on the need to have more trail opportunities for less than 50-inch vehicles. Two comments focus on Hell Canyon, including the Pleasant Valley area. There are two comments that believe the 50-inch tread width should be increase to 54-inch or 60-inch.
- **Comments wanting destinations or ties to communities or businesses (10):** These comments ask for connections to services such as gas, food, or other places of business. They request that the road/trail system be developed to connect communities and provide opportunities for points of interest. One commenter requested these communities, business, or points of interest be placed on the map.
- **Comments making general statements about wanting more of everything (60):** General statements include leaving the travel system as it is currently (3), keeping all roads open to motorized travel (9), including plans for future expansion (4), ensuring use of user submitted routes (2), the proposed plan is way too restrictive (concerned with lost motorized opportunities) from the current system (22), the motorized travel system needs to be dispersed throughout and not concentrated in any individual area (3), desired for winter time access (1), and encouragement to use paved, county, or gravel roads for connectors (4).
- **Comments wanting more loops (46):** The desire for these comments is to connect dead-end roads with loops (5) or just to create more looping opportunities in general (35), with specific mention of Hell Canyon needs for looping trails (2), Lead/Deadwood connectors (3) and utilizing county roads for connectors (4). Primary focus was for “trails” and not roads. One comment specifically mentioned less than 50-inch loop trails.
- **Comments wanting more single track trails (64):** Of these comments, four included increasing the single track miles to 300 or 500 or 1000, and nine comments desire single track in specific locations, i.e. Hell Canyon, Rochford, Camp 5, Piedmont, Nemo, Victoria Lake, Sugar Shack, Spearfish, Custer, and Newcastle. Several comments (10) disappointed in the 79 miles proposed, stating that “it would not provide enough enjoyable riding for a weeks stay in the Hills”.
- **Comments requesting specific routes by description or route numbers (122):**
 - All District—usually submitted by spreadsheet from user groups (9)
 - BL (18); 1 comment shared with HC
 - NH (38); with 2 comments shared with BL; 5 with MY; 2 with HC
 - MY (39); with 4 comments shared with NH
 - HC (18); with 3 comments shared with MY; 1 with NH
- **Comments requesting trailheads (8):** Two general comments about trailhead locations, one to place in strategic locations and another to ensure looping opportunities for trails return to a

common parking area. Other comments were for specific locations for trailheads; i.e. Peaceful Pines, Spearfish, Dumont, Pilot knob, Rochford, junction of Custer Crossing and Minnesota Ridge Road, Mad Mountain Adventures and Experimental Forest area.

- **Comments requesting trails for both ATV and motorcycles (48):** There were 48 comments requesting more trails for a variety of motorized uses, including rock crawlers (5), ATV use (2), comments for both motorcycles and ATV (19), and desire for trails in general rather than roads (21). Trails in general also include specific locations Hell Canyon (2), Bearlodge (1) and Northern Hills (1).
- **Comments wanting consideration for UTV (6):** Six comments received to include utility terrain vehicles in with all-terrain vehicles for trail designation. There desire is for the less than 50-inch designation to increase to either 54-inch or 60-inch.
- **Comments requesting year-round access (16):** Sixteen comments were received for year-round use of the proposed motorized travel system. Of these, five were specific for winter access; one because of a business.

Disposition: *The comments in this category reflect the purpose and need for this project, which calls for the development and designation of a motorized travel system. Many comments also request the Forest to provide a variety of motorized recreation opportunities. These comments were generally incorporated into Issue 2, Effects on Recreation Opportunities.*

Category 2: Remove Motorized Routes (292 Comments)

Public Concern: The Forest Service should remove specific motorized trails, roads, and trailheads from the Travel Management Plan as presented by the public.

Sub-Categories:

- **Comments wanting removal of dead end spurs (22):** Comments request elimination, obliteration, or decommissioning of dead-end spurs to prevent user-created loops (8). These dead-end routes are seen as “go nowhere” and encourage users to “break the rules”. To facilitate enforcement, comments recommend removing dead-end spurs from the map unless they lead to a destination.

Disposition: *Comments in this category call for the development of a motorized travel system that could reasonably be maintained and enforced. These comments were incorporated into Issue 3, Effects on Management Capabilities.*

- **Comments making general statements about wanting less of everything (98):** Comments focused on a need to reduce the overall miles available for roads and trails to the motorized vehicles. Comments included 54 statements to reduce the road miles; 17 to reduce the trail opportunities for ATVs and 4 to reduce motorcycles; and 18 that specifically mention 3,988 miles or 4,000 miles is “way too much”. Reasons for the reduction include 10 concerns for environmental resources; 6 to management concerns to maintain; and 7 for reduction in road density.
- **Comments wanting less loops (4):** These comments request not increasing the opportunities for loops to prevent abuse of the land and conflicts with the general public.
- **Comments requesting specific routes removed by description or route numbers (158):**
 - All District—usually submitted by spreadsheet from user groups (6)
 - BL (8); 3 comments shared with HC
 - NH (76); with 2 comments shared with BL; 2 with MY; 1 with HC

- MY (51); with 1 comment shared with NH; 2 with HC
- HC (13)
- **Comments requesting removal of trailheads (5 specific to Peaceful Pines) (11):** These comments recommend removing specific proposed trailhead locations.

Disposition: *These comments reflect concerns for effects of motorized travel use on natural resources. They were incorporated into Issue 1, Effects on Natural and Cultural Resources.*

Category 3: Off-Road Opportunities (327 Comments)

Public Concern: The Forest Service should add motorized off-road opportunities for dispersed camping, game retrieval, cross-country travel, teaching beginners to ride and mud bogging to the Travel Management Plan.

Sub-Categories:

- **Comments wanting areas for off-road use (95):** These comments request areas be identified to allow off-road opportunities anywhere the rider desires to go. Of the comments; 2 had suggested specific areas (Piedmont and Sheridan Lake); 5 recommended a specific size to consider (1 square mile [2], 15 square miles [1], and 100 acres [2]); 9 wanted areas for motorcycles with 1 specifically requesting small jumps; and 2 requested access to designated system from private property. One comment wanted to ensure the Prairie Creek decision was incorporated into the new Plan. Another comment suggested areas be set up for winter cross-country opportunities.
- **Comments wanting areas set up to teach beginners (“tot lots”) (12):** These comments request areas, sometimes refer to as a “play area”, to provide beginners a place to learn to ride and develop skills. Two comments recommended gravel pits as a suitable place.
- **Comments specifically supporting dispersed camping (103):**
 - 60 comments specifically requesting 300 feet
 - other comments ranged between 150 to 1,000 feet
 - 2 comments for less than 100 feet
- **Comments specific for wanting game retrieval (93):**
 - Request for increasing the distance; distances were from 500 feet to unlimited
- **Comments wanting mud-bogging (24):** These comments believe that mud bogging areas should be identified to reduce enforcement concerns or user-created ones from occurring (3). Two comments specifically state that “man-made mud bogs” could be built and one recommended the Farmingdale area.

Disposition: *These comments express desires for various forms of motorized recreation. They were incorporated into Issue 2, Effects on Recreational Opportunities.*

Category 4: Accessibility (23 Comments)

Public Concern: The Forest Service should consider the needs of the elderly and person with disabilities while designing a motorized travel management plan for the Black Hills National Forest.

Sub-Categories:

- **Comments specific to disability travel (categorized as recreation oriented) (7):** These comments focus on the recreational opportunities of motorized travel for persons with disabilities. Two comments suggest that the proposed designated motorized system would eliminate a large area of the Forest from their access due to inability to hike.

- **Comments related to hunting needs for disability or elderly (16):** These comments also include increasing the distance for game retrieval (5) and designating deer for retrieval (3).

Disposition: *These comments express concerns for various forms of motorized recreation. They were incorporated into Issue 2, Effects on Recreational Opportunities.*

Category 5: Environmental Concerns (93 Comments)

Public Concern: The Forest Service should evaluate impacts from motorized opportunities on environmental resources such as water, soil, wildlife, plants and other resources on the Black Hills National Forest.

Many of the comments received identified more than one resource area of concern for the proposed action for Black Hills motorized travel opportunities. The main resource areas of concern were for soil (7); water (21); wildlife and fish (36); plants (8); and archeological resources (5). Additional comments mentioned air, global warming, monitoring, mining access, private property, research natural areas, wilderness, and sensitive vegetation.

Disposition: *These comments were incorporated into Issue 1, Effects on Natural and Cultural Resources.*

Category 6: Enforcement Concerns (83 Comments)

Public Concern: The Forest Service should evaluate the law enforcement personnel available on the Black Hills to ensure compliance with the travel management plan.

Sub-Categories:

- **Comments concerning enforcement capabilities and wanting stronger enforcement (64):** General concern statements focus on the enforcement of the proposed designated system. Some comments (28) suggest that 4,000 miles of motorized routes will not be enforceable and a strategy or enforcement plan (4) should be developed before implementing the new plan. Some comments (5) recommend that the enforcement capabilities of the Forest should dictate the designation of the motorized system.
- **Comments wanting heavier fines (5):** Comments specifically recommend heavier fines to deter misuse of the system.
- **Comments wanting signs or gates to improve enforcement (14):** Comments recommend signing (10) the designated system of routes and trails and gating closure areas (1) to alleviate problems with lack of enforcement personnel.

Disposition: *Comments in this category call for the development of a motorized travel system that could reasonably be maintained and enforced. These comments were incorporated into Issue 3, Effects on Management Capabilities.*

Category 7: No Off-Road Opportunities (111 Comments)

Public Concern: The Travel Management Plan should limit the motorized opportunities to only trails and roads.

Sub-Categories:

- **Comments against dispersed camping activities (32):** These comments recommend not allowing dispersed camping on the Forest anywhere. Of the 25 comments made, 18 recommend that camping be allowed only in designated campgrounds and 7 comments specifically identify fires as a reason to prevent it.

Disposition: *These comments reflect concerns for effects on natural resources. They were incorporated into Issue 1, Effects to Natural and Cultural Resources.*

- **Comments against any off-road game retrieval (30):** Comments believe hunters should find other means of retrieving their downed animal rather than relying on motorized opportunities. Suggestions were quartering the animal, using hand carts, sleds, horses, or dragging. One comment suggested that hunting should “be an effort”.

Disposition: *These comments were incorporated into Issue 2, Effects to Recreational Opportunities.*

- **Comments supporting no mud-bogging activities (22):** These comments generally support the Plan to not designate any mud-bogging areas on the Forest.
- **Comments generally okay with no off-road opportunities (27):** Comments are supportive of not providing any off-road opportunities in the travel plan for the Black Hills National Forest. Comments support restricting the motorized opportunities to designated routes and trails.

Disposition: *Comments in these two sub-categories reflect concerns about impacts to natural resources. They were incorporated into Issue 1, Effects to Natural and Cultural Resources.*

Category 8: Special Permits (39 Comments)

Public Concern: The Travel Management Plan should designate motorized off-road opportunities for Forest Service permitted activities such as grazing and firewood gathering.

Sub-Categories:

- **Comments for firewood collection (31):** Comments concerned about the new designated motorized system would not allow for firewood gathering. Six comments recommend designating a distance, 300 feet, for this activity.
- **Comments about grazing activities (7):** Comments are concerned that the new designated system of motorized travel will affect their ability to administer their grazing permits. One comment was concerned about allotment gates being left open on designated motorized system.
- **Comment about special privilege for trapping activities (1):** One comment requested special consideration for trapping activities.

Disposition: *These comments indicate concerns over possible effects of motorized travel to other Forest programs and multiple-uses on the Forest. Firewood gathering on the Forest would be regulated under other authorities and would not be subject to this decision. Similarly, access by permittees to administer their grazing permits would be governed by the terms of their permit and not this decision. Effects of the alternatives on access for other recreational purposes will be disclosed in the EIS.*

Category 9: Big Game Retrieval (39 Comments)

Public Concern: The Forest Service should incorporate all big game species, including deer, turkey, mountain lion, and mountain goat in the Travel Management Plan for off-road motorized big game retrieval opportunities.

Sub-Categories:

- **Comments wanting to include game retrieval for all species (16):** These comments believe game retrieval should be included for all big game species, with 1 comment specifically requesting turkey; 2 for mountain lions; and 1 for mountain goats.
- **Comments wanting deer to be included with elk retrieval (20):** These comments were specific to including deer within the big game retrieval distance.

- **Special Consideration—Game retrieval based on weight (1); game retrieval for all vehicle types (2); increasing the distance (7); consideration for elderly (2):** One comment suggested that big game retrieval should be based on the weight of the animal. Two comments requested consideration for all types of vehicles to retrieve big game and not restrict to ATV retrieval. The other comments were also included in the above counts because they also identified interested in particular species for retrieval. Recommendations for increasing the distance for game retrieval ranged from 600 feet to 1,000 feet.

Disposition: *Access for retrieval of downed game was considered, and the Forest Service decided to address this issue in various ways in different alternatives. These concerns were incorporated as part of Issue 2, Recreational Opportunities.*

Category 10: Roads Versus Trails (29 Comments)

Public Concern: The Travel Management Plan should consider more motorized trails rather than roads.

Sub-Categories:

- **Comments wanting to use existing roads (9):** These comments object to the building or construction of new trails due to the extensive amounts of roads on the Black Hills National Forest. Recommendations are to utilize only existing roads for the travel management plan.
- **Comments wanting more trails rather than “gravel” roads (20):** These comments prefer the experience of trail riding to road riding. Seven of the comments specifically mention “no gravel roads”, while three mention that riding on roads is not much of an experience. One commenter specifically requested that the ORV trail system should not include roads passable to automobiles, while another recommend consideration of logging roads in the travel management plan. Two comments also mentioned the desire for a challenging system and that roads were not capable of providing a “challenged ride”.

Disposition: *These comments reflect different preferences for recreational motorized use. They were incorporated into Issue 2, Recreational Opportunities.*

Category 11: General Support (23 Comments)

Public Concern: Some commenters generally supported the Travel Management Plan as proposed.

Sub-Categories:

- Comments generally support various portions of the proposal from working with partnerships, “closing unless open” philosophy, or plans for future expansion. Some comments state “OK” or “generally support”.

Disposition: *These comments showed support for different aspects of the proposal, but did not identify reasons. The Forest Service appreciates the comments.*

Category 12: General Disagreement (19 Comments)

Public Concern: Commenters prefer not to be restricted to designated routes.

Sub-Categories:

- **Comments fully disagree with proposal (3):** These comments disagree with all proposed points of the proposed travel management plan.

- **Comments general statements (5):** These comments offer general statements such as “losing freedom of enjoying the Forest”, “objection to off-road travel is a problem throughout the Hills”, and “eliminate all user supplied input from the proposal”.
- **Comments requesting the FS to utilize the “current system” of roads/trails (11):** These comments specifically request to leave the current management strategy “open unless designated closed” for the motorized travel opportunities.

Disposition: *These comments reflect a variety of preferences for recreational motorized use. They were incorporated into Issue 2, Recreational Opportunities.*

Category 13: Multi-Use Conflicts (186 Comments)

Public Concern: The Black Hills National Forest should evaluate conflicts to other users such as noise, impacts to nonmotorized activities, ranchers, residential property, etc., when developing the motorized travel management plan.

- These comments response to conflicts with other uses of the Forest such as nonmotorized opportunities, solitude, safety, private property, communities, economics, and motorized impacts with other motorized users. The majority of these comments focused on noise (82), private property concerns (27), and impacts with nonmotorized users (43).

Disposition: *Concerns reflected in these comments were incorporated into Issue 3, which includes user safety; and Issue 4, Social and Economic Concerns.*

Category 14: Partnerships/Cooperations (117 Comments)

Public Concern: The Forest Service should consider all opportunities for funding, including developing a user fee system to help support the maintenance of the proposed travel management plan.

Sub-Categories:

- **Comments not broken out (usually comments against Governor’s Task Force) (28):** Comments generally support working with local, state, and other government offices to develop a motorized travel system. Eleven of the comments object to the formation of the Governor’s Task Force with two stating that there was no representative supporting nonmotorized interests.
- **Comments related to funding sources (33):** These comments are split between supporting (13) various means of providing funding to support the motorized system and disagreeing (14) with any outside organization providing funding for a specific interest. Those not supporting a variety of funding sources state that external funding sources could influence the management direction and achieve objections of outside organizations. Two comments recommend utilizing existing funds to provide a balance between all the needs of the Forest. Four comments recommend that users pay for the opportunities.
- **Comments requesting no additional fees added for the system (3):** These comments believe enough taxes are paid for this purpose or not enough of a trail system is offered to make a payment viable.
- **Comments supporting user fees (53):** These comments support user fees or a sticker system for motorized use. Three comments would like to see nonmotorized users with a user fee as well. Thirteen comments request the funds to support the motorized trail system.

Disposition: *These comments generally focus on how any motorized travel system might be implemented. Questions regarding fees, funding sources, and partnerships are outside the scope of the decision to be made on this project, and will be decided after a decision is issued.*

Category 15: Duplicate Records (51 Comments)

Disposition: *This is a records management concern. Disposition does not relate to the issues.*

Category 16: Forms with No Specific Comments (155 Comments)

Sub-Categories:

- Audubon form letter with no additional comments (16)
- OHV form letter with no additional comments (139)

Disposition: *This is a records management concern. Disposition does not relate to the issues.*

How Public Concern Statements Relate to Issues

From the comments and concerns summarized above, the Forest Service identified the following key issues.

Issue 1: Effects on natural and cultural resources.

The alternatives considered in the DEIS may have effects on natural and cultural resources. Effects to these resources will vary between alternatives and are mostly dependent on the miles of roads and trails open to motorized use. Restricting motorized use to a managed system of designated roads and trails, identifying specific seasons of use, and identifying authorized types of vehicle use, would improve protection for these natural and cultural resources. Effects to natural and cultural resources between alternatives are identified in detail in the effects analysis in Chapter 3.

Issue 2: Effects on recreational opportunities.

The alternatives considered in the DEIS may have effects on the amount of available recreational opportunities provided on the Forest, including motorized use on roads and trails, mixed motorized use roads, dispersed camping, big game retrieval, motorized trailheads, and nonmotorized opportunities. Effects to the recreational opportunities by alternative are identified in detail in the effects analysis in Chapter 3.

Issue 3: Effects of transportation system design on management capabilities.

The alternatives considered in the DEIS may have effects on the Forest's ability to proactively designate and manage system roads and trails, while also optimizing recreation experiences. The alternatives considered will have different effects on how the transportation system is able to address management concerns (such as law enforcement, user education, signing, and maintenance) while reducing management costs and focusing limited resources. Addressing many of the management concerns will be dependent on available funding sources, which will most likely be limited. The transportation system design can also affect public safety depending on the miles of mixed use roads. Any roads identified for mixed use will be reviewed in a mixed use roads analysis that includes mitigation to make reasonable accommodations for the public's safety.

Issue 4: Social and Economic Concerns.

The alternatives considered in the DEIS may affect the economic sustainability of local businesses and communities. Effects may be related to dust, noise, traffic level, trespass on private property, distance from motorized routes to private land, and miles of routes open to motorized use.