

Subject: Comment Letter on the Dakota Prairie Grasslands Travel Management Plan

Oct. 11th, 2024

To: Dakota Prairie Grasslands Management Team
U.S. Forest Service
2000 Miriam Circle
Bismarck, ND 58501

Re: Comments on the Dakota Prairie Grasslands Travel Management Plan

Dear Dakota Prairie Grasslands Management Plan Team,

On behalf of the Badlands Conservation Alliance (BCA), I am writing to provide comments on the Dakota Prairie Grasslands Travel Management Plan. BCA is a Voice for Wild North Dakota Places.

Badlands Conservation Alliance is dedicated to the restoration and preservation of the Badlands and rolling prairie ecosystem comprising western North Dakota's public lands, both state and federal. We provide an independent voice for conservation-minded North Dakotans and others who appreciate this unique Great Plains landscape.

It is also our mission to ensure that the public lands management agencies adhere to the principles of the laws that guide them and provide for wise stewardship of the natural landscapes with which the citizens of the United States have entrusted them — for this and future generations. We appreciate the opportunity to contribute to the development of a plan that balances access for multi-user groups while ensuring land stewardship for wildlife conservation and recreation enthusiasts alike.

In the early 1970s, five hundred thousand acres on the Dakota Prairie Grasslands' western-most Little Missouri National Grassland unit qualified for Wilderness designation. By 1977, when the second Roadless Area Review and Evaluation was complete, the number of acres eligible had been cut in half. With the signing in July 2002 of the current Land and Resource Management Plan for the Dakota Prairie Grasslands, less than 40,000 acres are managed by the Forest Service as "Suitable for Wilderness." Undeveloped wild land is now GONE! Now, in October 2024, BCA is devastated to know that some estimates claim less than 25,000 acres of LMNG are designated as suitable for Wilderness.

The proliferation of roads now estimated at over 2,800+ miles in the LMNG have had a devastating impact on the western ND way of life, wildlife habitat, and the fragile, yet disappearing iconic grasslands. A more harmonious balance must be struck to support oil and gas development while recognizing the growing, diversified role that wildlife habitat and recreation play in the North Dakota economy. We hope the Forest Service considers the following comments to strike the now critical balance.

1. OHV Use Concern in the Badlands

Badlands Conservation Alliance is concerned about the growing use of off-highway vehicles (OHVs) in the Dakota Prairie Grasslands and the Badlands region. An estimated 30-40k OHVs are permitted in North Dakota, and BCA recommends that OHV use be directed to designated main roads only, with clearly signed restrictions for off-road travel. BCA does not support the creation of ‘designated areas’ for OHV use in the LMNG and Badlands.

The Badlands that encompass the Dakota Prairie Grasslands are crucial to North Dakota’s outdoor heritage, and unregulated or extensive OHV use can not only disturb wildlife and fragment habitat, but also erode soil necessary for preserving a way of life in western ND.

2. Protection of Wildlife Habitat and Support for Non-Motorized Recreation

BCA continues to support restrictions to additional motorized access in the LMNG. With an estimated 2,800+ miles of roads within the LMNG, BCA would oppose the creation of any additional roads. The Forest Service plays a vital role ensuring non-motorized areas remain havens for wildlife and outdoor enthusiasts who simply want to avoid the noise and congestion of modern life. BCA supports the multi-users who wish to access our public lands and supports restricting motorized access and promoting non-motorized recreation to also preserve and protect the dwindling grasslands necessary for our ranchers and the grazing community.

Badlands Conservation Alliance supports:

- Limiting motorized access to designated roads and trails only, particularly in sensitive wildlife habitat and riparian areas.
- Expanding non-motorized trail networks in areas where wildlife and bird migration disturbance is minimal.
- Enhancing public education efforts to promote responsible land use and conservation.

3. Closing Superfluous Roads, Especially Around Inventoried Roadless Areas

BCA supports the closure of superfluous roads to motorized travel, particularly in areas surrounding Inventoried Roadless Areas (IRAs). These road closures should focus on protecting remote areas that are increasingly rare in North Dakota and that enhance wildlife security.

BCA understands and respects the importance of allowing ranchers with grazing leases to maintain vehicle access to necessary areas for managing their livelihood. We support a system that ensures ranchers’ needs are met while closing unnecessary roads that fragment habitat and disturb wildlife.

4. “Access To, Not Access Through” Public Lands

BCA supports an approach to public land management that emphasizes “access to, not access through.” The principle ensures multi-use groups can reach and enjoy these lands, but without compromising their ecological integrity. North Dakota wildlife habitat is essential to our way of life, and opportunities for quiet, non-motorized recreation, and we believe these values should be prioritized over expanding motorized road access.

5. Improved Signage for Roads Leading to State Trust Lands

One of our concerns is the potential for recreationists and sportsmen to unknowingly violate State Trust Land rules due to insufficient signage. To avoid such situations, BCA would like to see the US Forest Service and State Trust Lands Department work together to improve signage on roads that lead into State Trust Lands. Clear identification of open and closed roads would help inform the public and reduce unintentional infractions that ultimately could lead to the creation of additional two track roads. Engaging user groups to assist with posting signage could be considered.

6. Ongoing Monitoring, Adaptive Management and Public Collaboration & Outreach

Lastly, BCA encourages the Forest Service to establish a framework for ongoing monitoring and adaptive management of the Travel Management plan. This will ensure the Plan can respond to changing conditions and new conservation challenges over time such as increased traffic from the Theodore Roosevelt Presidential Library once open in July of 2026, or if/when a reservation system to visit Theodore Roosevelt National Park is implemented. Public outreach meetings similar to the recent open houses to discuss Travel Management could be considered to educate user groups and the public on OHV use, habitat protection, and to promote non-motorized recreation.

Badlands Conservation Alliance is willing to collaborate with the Forest Service to develop outreach initiatives and educational programs that foster greater understanding of the ecological value of the Dakota Prairie Grasslands.

In closing, BCA supports a Travel Management Plan that better strikes a balance between public access and the conservation of North Dakota’s unique western ND landscape. By closing superfluous roads and limiting unnecessary road construction, and prioritizing non-motorized recreation, we send a strong message that the Badlands and Little Missouri National Grasslands are open, accessible and enjoyable for future generations.

Thank you for considering BCA’s comments. We look forward to working together in the interest of preserving and protecting the Little Missouri National Grasslands and Badlands of western ND.

Sincerely,
Shannon Straight

Executive Director
Badlands Conservation Alliance
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