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Comments: Subject: Comments on the Dakota Prairie Grasslands Travel Management Plan - LMNG

Oct. 14th, 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 - LMNG

Dear Dakota Prairie Grasslands Management Plan Team,

On behalf of the North Dakota Sierra Club, I am writing to provide comments on the Dakota Prairie Grasslands Travel Management Plan. The North Dakota Sierra Club has members throughout North Dakota who care about stewardship of lands throughout North Dakota and beyond.

It is also our goal 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.

The number of acres on the Little Missouri National Grasslands which qualified for Wilderness designation in the early 1970's was close to five hundred thousand. These qualifying acres have been drastically cut. Less than 40,000 acres qualified for wilderness in 2002 when the current Land and Resource Management Plan for the Dakota Prairie Grasslands was signed. Despite the management plan, the acreage suitable for wilderness continued to decline, and some current estimates of Suitable for Wilderness lands 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

North Dakota Sierra Club is very concerned about the growing use of off-highway vehicles (OHVs) in the Dakota Prairie Grasslands and the Badlands region. The number of OHVs has skyrocketed in North Dakota, and Sierra Club recommends that OHV use be directed to designated main roads only, with clearly signed restrictions for off-road travel. Sierra Club assisted with specific signage in the Shyenenne National Grasslands and would like to see similar signage installed in the LMNG. Similarly, communication with ORV clubs AND SELLERS to provide OHV users with current maps, both electronic and paper and at a scale which is user-friendly. Current, easily accessible maps are essential to spread the word and keep OHV use in designated locations. An example would be an App or downloadable, interactive map similar to the one ND Game and Fish has for hunting access and

posting (downloadable because of limited cell phone access in much of LMNG).

Sierra Club North Dakota 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

North Dakota Sierra Club continues to support restrictions to additional motorized access in the LMNG. With an estimated 2,800+ miles of roads within the LMNG, Sierra Club 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. Sierra Club 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.

Sierra Club North Dakota 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.
- *Restricting ORV camping access to designated campgrounds only (eg. no Dispersed Camping areas along roads like the 300' camping buffer available in the Sheyenne National Grasslands).

3. Closing Superfluous Roads, Especially Around Inventoried Roadless Areas, Non-Motorized Areas, And the Maah Daah Hey Trail

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

Closing of superfluous roads and creating a "wild corridor" along the Maah Daah Hey Trail would increase the wild feel of the trail and enhance the experience of trail users. Similarly, closing of superfluous roads on and near the perimeter of Non-Motorized units of the LMNG helps to protect the wild feel of the units and the wildlife who live there.

Sierra Club 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

Sierra Club 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, Sierra Club 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. This is another area where an interactive, downloadable map, App, or similar is imperative. Communication with ORV owners, clubs, and sellers is also necessary. Information sent out with ORV registrations and hunting licenses are other possible avenues.

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

Lastly, Sierra Club 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.

Public Outreach is imperative to the successful implementation of the new Travel Management Plan. Suggestions include:

- *Communication with ORV clubs, owners AND SELLERS to provide OHV users with current maps, both electronic and paper and at a scale which is user-friendly, is essential to spread the word and keep OHV use in designated locations. An example would be an App or downloadable, interactive map similar to the one ND Game and Fish has for hunting access and posting (downloadable because of limited cell phone access in much of LMNG).

- *Information could be sent out with OHV registrations each year, including websites and QR codes. Hunting Licenses are another possibility for information dissemination.

- *Websites and QR codes leading to maps and rules should be available at all trailheads and parking areas. This information should also be posted prominently in nearby towns, gas stations, and areas where there is internet access.

- *Detailed maps should be posted at all trailheads and parking areas. Since cellular access is limited in many places, the maps should be of sufficient size and detail to allow a photo to be taken of the map for later reference.

- *Public outreach meetings similar to the recent open houses to discuss Travel Management could be considered to assist user groups and the public to understand proper OHV use, habitat protection, and to promote non-motorized recreation.

- *Videos or webinars explaining the new rules and maps would be a good way to try and reach additional users; our highly digital world gives us unprecedented access to users and this access should be capitalized upon.

Sierra Club 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, Sierra Club supports a Travel Management Plan that better strikes a balance between public access and the conservation of North Dakota's unique western ND landscape. WE NEED TO PRESERVE WHAT IS LEFT! 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 North Dakota Sierra Club's comments. We look forward to working together in the interest of preserving and protecting the Little Missouri National Grasslands and Badlands of western North

Dakota.