

## **APPENDIX B- Summary of Public Comments and Responses**

## EA Questions and Comments

The following summarizes questions and comments received before, during and following the public meeting presentation held April 22, 2016 in Hill City. Formal responses to questions are included below. All questions and comments were taken into consideration in the NEPA decision.

### VERBAL COMMENTS MADE DURING PRESENTATION AND RESPONSES

**Comment 1A: Why was the EIS changed to an EA?**

**Response 1A:** Due to the potential for impacts to resources including wetlands, fens, and historical and archeological sites, the FHWA initiated the NEPA review process as an EIS in accordance with the Council of Environmental Qualities NEPA guidelines. This process identified all environmental resources associated with this project and the potential for impacts by alternative. The Joint Lead Agencies subsequently reduced the project's scope of work by reducing the overall roadway width to be more consistent with similar low volume surfaced roadways in Pennington County. This scope of work reduced the impacts to resources initially identified as necessitating an EIS; therefore, FHWA made the decision to prepare an EA for the assessment of project impacts.

It was noted during the meeting that information included in the EA was the same information that would have been included in a Draft EIS (DEIS) and that an EA might reduce the overall NEPA process.

**Comment 2A: What is the preferred alternative?**

**Response 2A:** Alternative #1 is described in the EA as the recommended preferred alternative. This alternative primarily utilizes the existing alignment, minimizing impacts to the natural environment.

**Comment 3A: As a property owner with cabins in Rochford, this landowner disagreed with the use of rumble strips and signs as mitigation for increased traffic through the Rochford area. An increase in traffic through Rochford presents safety concerns that will not be resolved with rumble strips or signs. The rumble strips are noisy and signs may not work. People walk on the road as there are no sidewalks. Increased traffic will have unintended safety consequences. The community needs to work with the County to develop a good approach that keeps people safe (not rumble strips) such as posting a 15 mph speed limit and installing speed bumps. What counts is what the Rochford community wants.**

[Note: This citizen made additional verbal comments during the meeting. These comments were clearly captured in comment letters identified as 11c and 12c. Therefore; responses have not been repeated in 3A but may be found in 11c and 12c.]

**Response 3A:** Community character and cohesion is discussed in Section 3.1.4 of the EA and Draft Section 4(f) Evaluation. This section describes the existing environment and evaluates the impacts that Alternative 1, Alternative 2, and the No-Build Alternative would have on community character and cohesion. During the NEPA process, the Joint Lead Agencies worked with the Public Steering Committee (Committee) represented by property owners along the South Rochford Road and from the community of Rochford, to better understand the potential for impacts on the community and to identify potential mitigation measures, when necessary. Information gathered from the Committee and public meetings were used to develop the community character and cohesion section of the EA and Draft Section 4(f) Evaluation.

In order to examine how the community currently functions, the Committee was consulted on these events and their opinions on the Project. The Committee believes that the preferred alternative will increase traffic through Rochford and increase hazards to pedestrians. Safety is typically improved by separating pedestrians from automobiles with the use of urban designs such as curb and gutter, sidewalks, crosswalks, and formalized parking. However, the Committee indicated the Rochford community may be opposed to these features. Several reasons cited include: 1) affects these features may have on the “ghost town” appeal, 2) impacts to private properties, and 3) topography constraints imposed by the river, retaining wall, and homes.

South Rochford Road, being upgraded with an all-weather surface will provide a travel corridor similar to other paved scenic corridors in the Black Hills. This will likely result in more visitors to the area (i.e. increased traffic) and characterized as a moderate impact to Rochford. Therefore, the following mitigation measures are included to address potential traffic increases within the community.

- 1) Speed Message Boards: Devices that display the driver’s speed will be installed on each of the three roadways (South Rochford Road, Rochford Road, and North Rochford Road) entering Rochford.
- 2) Gateway Signs: The County will be responsible for furnishing and installing up to three gateway signs for Rochford. Size and colors will conform to the Manual on Uniform Control Devices (MUTCD) (if applicable). The County will coordinate with at least one of the Committee members or another representative of the community to design the sign.
- 3) Pedestrian Warning Signs: MUTCD approved pedestrian signs (for example, ‘Yield to Pedestrians’ or ‘Slow - Watch for Pedestrians’) will be installed within Rochford. The County will work with the community to identify which warning signs are appropriate. Pedestrian warning signs will be installed after the speed message boards and gateway signs in locations that will best protect pedestrians.
- 4) Informal Parking: Prior to construction of the preferred alternative, Pennington County will construct approximately 80 feet of informal (unpaved) parking within the County ROW to be located on the east side of North Rochford Road between the Moonshine Gulch Saloon and Rochford Mall.

In the future, the County will utilize traffic counts and safety concerns identified by the community or County to determine the effectiveness of the implemented mitigation measures. If it is determined that the proposed measures are not effective and additional measures are required, the following are examples of what could be considered: reduction of the posted speed within Rochford and provisions for stop signs at intersections. The County will include the Rochford community and public at large in this decision making process by discussing the topic at a Pennington County Board of Commissioners’ meeting.

**Comment 4A:** This commenter stated that he has been around here longer than most people in attendance. He pays taxes. He stated this is one of the poorest run meetings he’s been to as people can’t hear what is being said (poor microphone and acoustics). He stated that he understands bureaucrats and how they spend money. He believes the whole culture pushing the road is based on money (Rochford to Hill City). They want to change the quiet to an urban area. Some of his family have lived and ranched in this area for over 100 years. Some of his Native American friends bought land that was theirs in the first place. It is about a cultural that makes a lot of noise for that purpose really; that’s the excuse. The Aryan culture that disregards the rights of women. I’ll be damned if I’ll work one day with those folks; they are taking over the Hills. The Department of Transportation; departments of the State of South Dakota and corruptions. People don’t need interference. Don’t need to have their peace and quiet ruined by making a nice track for motorcycles (Hill City to Rochford). Rochford is a wonderful town. All we need is to have the bridge fixed; without tearing up the road. People need to fight bureaucrats to ensure their livelihood; paying the price themselves.

We're better than the smell of money. We don't want to "California-nize" the entire Black Hills. It is a treasure. We need to fight to keep it. This is a rich culture – we need to pay attention if we want to survive. He doesn't need any more noisy machines in his environment. Spring lifts his heart with the sounds of meadowlarks – this should be important to all of us. He thinks about culture. He doesn't care what people think about him; but this is for his kids, grandkids.

**Response 4A:** Sincere apologies given for the poor microphone and acoustics.

**Comment 5A:** Agreed with the previous comment. There are other people that are for a culture different than money and motorcycles. She wants to hear from the community and have a conversation about the project and the concern for nature of South Rochford Road and the resources there.

**Response 5A:** Comment noted.

**Comment 6A:** Commenter lives on South Rochford Road and stated the project impacts them more than a lot of others attending this meeting. Her biggest complaint is the dust. Pennington County doesn't provide dust control. This road project will improve health by eliminating the dust and improve driving conditions. She recognizes there will be more traffic, but that traffic continues to increase without a new roadway. Let's get rid of the dust.

**Response 6A:** While not part of the purpose and need for this project, dust control is identified as a project goal in the EA. An all-weather surfaced roadway will reduce dust from traffic on the roadway.

**Comment 7A:** If this project is approved, is there funding to build it?

**Response 7A:** During the meeting it was noted the County has approximately \$11 million dollars in Federal and County funds reserved for the Rochford Road project. The County indicated they may need to shift funding from other projects depending on the bids received. The County is also researching alternatives other than standard asphalt concrete surfacing to reduce the cost of the project. One surfacing alternative being looked at is a stabilized base material that would include a chip seal on top.

Section 1.4.1 of the EA states Federal funds in the amount of \$9.0 million was authorized by SAFETEA-LU for reconstruction of South Rochford Road. Use of these funds requires an 18.05% local match. Federal funds may only be used for the South Rochford Road project (i.e. not moved to other projects) including project development and NEPA, final design, and construction. In addition, an amount of \$0.319 million Federal Bridge Program funds are shown in the SDDOT 2016-2019 STIP for the replacement of the Rapid Creek bridge on South Rochford Road. The Federal bridge program requires 20% local matching funds.

**Comment 8A:** Will the chip seal surface be a gravel surface?

**Response 8A:** No. The roadway surface would be composed of aggregate blended with some type of binder material. Standard asphalt concrete surfacing material is composed of aggregate blended with an asphalt binder material. The County is exploring other possible binder materials.

**Comment 9A: Does a chip seal take more maintenance?**

**Response 9A:** No. The type of chip seal being discussed here is one used to extend the service life of an all-weather surface (aggregate blended with binder material). This type of chip seal is a standard maintenance activity used on top of an all-weather surface.

**Comment 10A: Will an alternative surface stand up to Logging Trucks?**

**Response 10A:** Yes. The roadway will be designed to accommodate standard roadway design vehicles including logging trucks.

**Comment 11A: Will Ice Box Canyon and frost heaves be fixed?**

**Response 11A:** Ice Box Canyon is a challenge.

Section 2.2.2.2, states that Preferred Alternative 1 includes all-weather surfacing of the existing South Rochford Road, with horizontal and vertical curve changes mainly within the existing ROW along with improvements to drainage in select locations.

Due to topographic limitations, Ice Box Canyon will continue to be steep and curvy, though modifications will include flatter horizontal curvature where possible. Standard design practices will incorporate an improved drainage conveyance system (i.e. ditches and drainage pipes). The subgrade (material below the roadway surface) will be reconstructed to provide strength for the all-weather surfaced roadway and to address frost heaves and to improve existing roadway deficiencies and other maintenance concerns. Some tree clearing will take place, where and when possible, to allow sun light to melt snow and ice within Ice Box Canyon.

**Comment 12A: Wheel tax is a big issue affecting other Pennington County Road projects like Baseline Road. Would you take funds from that project?**

**Response 12A:** Question was deferred for discussion at a Pennington County Commissioners meeting. Pennington County is currently in the process of discussing the County's roadway budget. County Commission meetings and budget meetings are open to the public. Contact Pennington County for further details.

**Comment 13A: Employee identified himself as an employee of West Dakota Water District. He indicated they were concerned with water quality and maintaining water quality in the wetlands and creeks during construction (bridge). Personally he rides motorcycles and believes if a motorcyclist can't ride on gravel roads they should put their kickstand down. He also expressed concern with the freeze, thaw, and frost heaves in Ice Box Canyon stating he was not sure this project will fix it.**

**Response 13A:** Roadway and bridge designs will include monitoring and protection of wetlands and streams. Approved best management practices (Storm Water Pollution and Prevention Procedures) including silt fence and other erosion control devices will be included in the construction contracts.

With regard to freeze, thaws, and frost heaves, please refer to Response 11A.

**Comment 14A:** If the county had been using Mag Water for the last 20 years we wouldn't have this problem.

**Response 14A:** Mag water is a generally a method used to suppress dust and may result in some extending surface smoothness. Use of this substance or other similar products however would not address the 4 project needs identified in Section 1.2 of the EA.

**Comment 15A:** No other public officials are present at this meeting. This seems to indicate a lack of support for the project or that it is not important.

**Response 15A:** Pennington County continues to be actively involved as a Joint Lead Agency in the development of this project and the EA.

**Comment 16A:** Speaker reminded everyone to visit the displays and to provide comments tonight to any of the project team. May submit comments using the comment cards by leaving them tonight, sending them to HDR address in the hand out, or electronically through the project's website. Comments over the last two years have been considered in the development of the EA. It is extremely important to get your comments in by the deadline of May 16, 2016 to ensure they can be considered.

**Comment 17A:** What is the purpose of this meeting? I was hoping to hear from community members what their thoughts were on the project, not to talk one-on-one to team members.

**Response 17A:** The purpose of this meeting was to provide an update on the NEPA process (EA); make sure people understood the recommended preferred alternative (Alternative #1); and to receive public comments regarding information provided in the EA.

An opportunity to discuss with team members information presented in the EA was provided before and after the presentation. An opportunity for group discussions was provided with the presentation to discuss concerns related to the general public as a whole.

## VERBAL COMMENTS RECEIVED AT STATION BOARDS AND RESPONSES

**Comment 1B:** Concerned with design details – particularly Ice Box Canyon (bridge to top of hill). If project goes through, careful consideration is needed in the design, construction, and maintenance of this section.

**Response 1B:** Refer to Response 11A.

**Comment 2B:** Concerned with speed control and slowing traffic down in the Rochford Community.

**Response 2B:** Options to address speed control and slowing down traffic within Rochford are included in Section 3.1.4 community character and cohesion. Additionally, refer to 3A response above.

**Comment 3B:** There are noise issues with use of rumble strips.

**Response 3B:** Refer to Response 3A.

**Comment 4B:** Desire to have a call with Steering Committee (Paul Larson) to see what they are hearing from the community.

**Response 4B:** The NEPA Project Team held a final Committee meeting on 6/15/2016 (following the public comment period) to discuss additional public input and mitigation alternatives for Rochford.

**Comment 5B:** Landowner who leases land had questions about fencing near roadway, safety issues and protection of livestock. Future mitigation may be needed for grazing safety concerns.

**Response 5B:** Section 2.2.2.2 includes a statement that fencing in areas currently designated as open range may be required. Fencing will be considered by the County during final design and land owner meetings.

**Comment 6B:** Should have had more information about the alternatives including the pros and cons of each. Also, what is the estimated cost of each?

**Response 6B:** Chapter 2 of the EA provides an overview of the alternatives analysis. Cost estimates by alternative are included in Section 2.3.2. Pros and cons are summarized by resource in Table 4-1. Impact Summary of Alternatives.

**Comment 7B:** Emphasized the need to get the bridge fixed as soon as possible.

**Response 7B:** 2016-2019 Statewide Transportation Improvement Program shows reconstruction of the Structure with Approach Grading in 2017.

**Comment 8B:** The biggest concern is dust from the gravel surfacing and its impact on health and vegetation.

**Response 8B:** Section 1.5 identifies dust control as a project goal. This was included based on previous public comment. Section 3.3.1.3.1 states that dust from the road coats adjacent vegetation and reduces habitat quality.

**Comment 9B:** Noted that there is significant ATV traffic on the roadway in the summer months. This has significantly increased traffic throughout the summer months in Rochford. Many ATV users are creating safety issues due to speed and under age drivers.

**Response 9B:** Section 3.1.4.2 discusses the increase in visitors to the area associated with ATV trail use. Speed and age of drivers is an enforcement issue that should be referred to law enforcement.

**Comment 10B:** Questions were received on what the project construction cost would be and where that money is coming from.

**Response 10B:** Refer to Response 7A.

**Comment 11B:** Concerned with the subgrade and heaving issues in ice box canyon that needs to be addressed before any surfacing is installed.

**Response 11B:** Refer to Response 11A.

**Comment 12B:** Recommended including more in areas of tree clearing to improve site distance and sunlight to melt ice and snow on the roadway

**Response 12B:** As noted in Section 3.1.3.3, the limits of tree clearing would extend to the edge of the proposed ROW (50 feet on either side of the proposed centerline of the build alternatives) and possibly beyond on Forest Service property for the purpose of improving site distance at some curves. Additional tree clearing may be necessary to allow sunlight to melt snow and ice on the roadway. The extent of tree clearing will be determined during final design and ROW negotiations.

**Comment 13B:** Concern regarding intersection safety at the intersection of South Rochford Road and Rochford Road. Vehicles heading into town on Rochford Road drive too fast.

**Response 13B:** The new intersection will be designed to meet current design standards. South Rochford Road will include a stop condition at Rochford Road. Driver speeds should be referred to law enforcement.

**Comment 14B:** Vehicles frequently drive down Mickelson Trail by mistake.

**Response 14B:** Design will coordinate with the SDGFP during final design to determine whether special design considerations are necessary at the trail crossing with South Rochford Road.

SDGFP has jurisdiction over Mickelson Trail and authorizes types of vehicles allowed.

**Comment 15B:** Traffic has significantly increased on South Rochford Road over the years and it needs to be safer.

**Response 15B:** The purpose and need for the project is outlined in Chapter 1 of the EA. Section 1.4.3 notes that improving the geometrics on South Rochford Road is a proactive effort to improve safety.

<p><b>Comment 16B: Concerned about right-of-way impacts and impacts to driveways.</b></p> <p><b>Response 16B:</b> The EA evaluated a 50 ft. ROW corridor (typically) for the recommended preferred alternative and examined preliminary impacts. Should the project move forward, land owner meetings will be held with affected property owners during the design process to discuss design and ROW considerations affecting individual property owners.</p>
<p><b>Comment 17B: When will the bridge be built?</b></p> <p><b>Response 17B:</b> Refer to Response 7B.</p>
<p><b>Comment 18B: The bridge is the only thing that needs to be fixed.</b></p> <p><b>Response 18B:</b> Refer to Response 7B.</p>
<p><b>Comment 19B: Frustrated with money being spent on process instead of project.</b></p> <p><b>Response 19B:</b> Comment noted. The NEPA process as described under 40 CFR 1500-1508 is required prior to a Federal Agency taking an action.</p>
<p><b>Comment 20B: Will the frost heave problems be fixed with the chip seal?</b></p> <p><b>Response 20B:</b> Refer to Response 11A regarding accommodations of freeze, thaw, and frost heaves.</p>
<p><b>Comment 21B: The County should have done a better job with maintenance of the existing road. It may be too late now.</b></p> <p><b>Response 21B:</b> Comment noted.</p>
<p><b>Comment 22B: Landowner's family owns area designated as fen on Figure 3-7 on Sheet 7 of 27.</b></p> <p>Stated area had been plowed by his family in the past and was surprised it was shown as a protected fen area. He had planned to construct a pond in this area and wondered if this was allowable.</p> <p><b>Response 22B:</b> Referred landowner to the US Army Corps of Engineers as they are the federal agency with jurisdiction over Section 404 regulations.</p>
<p><b>Comment 23B: Suggested fencing should be considered for safety due to grazing.</b></p> <p><b>Response 23B:</b> Section 2.2.2.2 of the EA includes a statement that fencing in areas currently designated as open range may be required. This will be considered further in final design and ROW negotiations.</p>
<p><b>Comment 24B: Is there enough money to build the project?</b></p> <p><b>Response 24B:</b> Refer to the Response 7A.</p>
<p><b>Comment 25B: Stated that the existing subgrade frost/heave problems cannot be fixed with a surfacing project.</b></p> <p><b>Response 25B:</b> Refer to Response 11A.</p>

**Comment 26B:** Asked how river and wetlands would be kept clean during construction.

**Response 26B:** Refer to Sections 3.4.1.3.2 and Section 3.4 of the EA for a discussion of construction impacts on Wetlands and Other Waters of the U.S.

**Comment 27B:** Stated motorcycles are no excuse to pave the road.

**Response 27B:** The purpose and need of the Project is outlined in Chapter 1 of the EA.

**Comment 28B:** Stated ice conditions through Ice Box Canyon will not be solved by paving.

**Response 28B:** Refer to Response 11A.

**Comment 29B:** Lives on South Rochford Road. Dust is health issue. Supports paving the roadway.

**Response 28B:** Refer to Response 8B.

**Comment 31B:** Meeting facilities were not acceptable. Problems hearing. Did not like being encouraged to comment one-on-one but wanted to have public discussion.

**Response 31B:** Sincere apology for the poor acoustics. The question and answer portion of the meeting was provided to allow for public comments on general topics. One-on-one questions and answers before and after the meeting are encouraged and valuable to ensure individual questions can be understood and addressed.

The presentation and all exhibits are available on the project website [www.SouthRochfordRoad.com](http://www.SouthRochfordRoad.com).

## SUMMARY OF WRITTEN COMMENTS AND RESPONSES

### [ Comment Cards, Letters and Emails ]

#### Comment 1C:

The highway sup says the road will be designed for 55 mph. Could the speed limit be posted lower, like 45. I own property thru which the road passes.

**Response 1C:** The design speed is currently planned for 50 MPH. The posted speed is currently planned for 45 MPH (black and white signs). There will be a number of design exceptions necessary due to the steep horizontal and vertical curves. Advisory speeds plates lower than 45 MPH (black on yellow) would be place in areas where design exceptions are necessary.

#### Comment 2C:

We support the option chosen through the EA process as it will make the road safer and solve a major dust problem we experience constantly. We have a home along the right of way and wish to see the project move forward as soon as possible.

**Response 2C:** Comment noted.

#### Comment 3C:

As you can tell from my return address, I live on South Rochford Road and therefore, has some legitimacy to back my comments.

This road has been in existence for over 100 years and minor changes now must certainly have minimal impacts at this point.

Paving the existing road will only help in all aspects; dust reduction, maintenance costs reduction, improved surface providing a better ride and less vehicle destruction.

I am, therefore, backing Plan 1.

**Response 3C:** Comment noted.

#### Comment 4C:

If our tax money needs to be spent on South Rochford or be lost, why not put a finish on it that is less dusty? Or, put it on Mystic Rd. they have more traffic due to the Mystic trail head, and the dust is worse. Also, is this to benefit the rally motorcycles? The Rally closes Hill City Main Street – the native people can't get groceries or gas during the major part of the day for the duration of the rally. Why should we deal with them and listen to them in our own homes on So. Rochford Rd. too? Leave it as is, the Hills don't need more "impact" on wild life or environment. We natives don't want it up here.

#### Response 4C:

*Regarding Federal funds:*

Federal funds were authorized in the amount of \$9.0 million. Federal funds may only be used for the South Rochford Road project (i.e. not moved to other projects). For additional information regarding use of authorized federal funds, please reference:

<http://www.fhwa.dot.gov/cfo/earmarkrepurposing/>

*Regarding limiting work to surface treatment:*

Please refer to Chapter 1 of the EA describing purpose and need for the project. Limiting work to a surface treatment would not correct the drainage and frost heave deficiencies described in Sections 1.4.1 through 1.4.3. These deficiencies contribute to frost heaves, roadway failures during localized flooding events, and would not reduce future maintenance costs for the Pennington County.

Refer to Response 11A regarding accommodations of freeze, thaw, and frost heaves.

*Regarding need for the project and resulting Sturgis Bike Rally impacts to the area:*

Section 1.2 of the EA notes the needs for the project, which includes addressing the roadway maintenance costs, correcting the geometric deficiencies along the roadway, and roadway system linkage. This route is currently and will remain a public roadway open to both local and tourist traffic, including those associated with the Sturgis Bike Rally. Section 3.1.4 describes the community and character within the Project Areas and addresses how it would be affected by the alternatives. Please refer to Section 3.1.4.3.2 of the EA and Section III of the FONSI for a discussion on direct and indirect effects due to the preferred alternative to the community's character and cohesion. This section recognizes there will be both positive and negative effects to the community due to traffic volumes during the summer tourism months.

**Comment 5C:**

**South Rochford Road Project**

Since the 1<sup>st</sup> meeting in the Hill City Senior Citizens building 2008, over ½ of the attendees have moved away, seem uninterested as they think the project will never happen, or have died. We know this compounds the issue as many have not anticipated the results of tests and possible options based on those tests and now they speak up. We do appreciate the work done and await, with so much anticipation, the road work to start (especially the bridge as we were in on the initial plans and gave land so we hope to be included in the final plans for the road and ditch work. When the huge flood occurred, it was the road that left us in a mess, not Rapid Creek. We were told that about half of the existing road would belong to us (in exchange for the bridge land.) and we anxiously await the time we can complete our landscaping and live without the dust.

Rumble strips for Rochford....PLEASE NO..... everyone in the area chose the location to enjoy the peace and quiet that comes with Hills living.....No one would appreciate that racket and we know that signage is the answer without the noise.

We hope the slow progress will have the road and bridge projects completed while we can enjoy it.

We would like you to thank Cheryl Chapman for the professional way she handled the meeting.

**Response 5C:**

*Regarding Rapid Creek Bridge*

Refer to Response 7B regarding reconstruction of the Rapid Creek structure.

*Regarding Rumble Strips*

Refer to Response 3A regarding rumble strips

**Comment 6C:**

Issues from the people are not really discussed, comment cards do not allow the people involved to obtain face to face answers to their questions... Why if a chip seal is being considered wasn't this covered in the EA? I don't believe the need to reduce the maintenance cost for present roadway accurately is represented in the EA. The damage through Ice Box Canyon was due to a unpredictable high amount of rain in short time. This section of road will always have the frost heaves, curves ect. whether it is paved or not. Will county sand or use chemicals on new surface in the winter months on icy areas? How will this effect the environment (fens, wildlife, plants)? This is not covered in the EA. Could improvements for drainage be done without making the road an all weather surface?

**Response 6C:**

*Meeting format*

While verbal comments are responded during the meeting in the best manner possible, comment cards are preferred by agencies to ensure the Joint Lead Agencies are able to accurately respond to the questions and comments received.

*Surface treatment:*

Refer to Comment 8A and 9A. The surface treatment will be an all-weather surface roadway as discussed in the EA.

*Maintenance Costs:*

Section 1.4.1 addresses the methodology utilized to determine roadway maintenance costs and the cost of maintenance of South Rochford Road per mile. Figure 1-3 summarizes average annual maintenance cost per mile of other similar roadways.

*Design:*

Refer to Response 11A regarding design and frost heaves.

*Winter maintenance:*

Refer to Section 3.2.3.3 and 3.3.2 regarding winter maintenance and effects to the environment.

*Federal Funding:*

In order to fulfill the purpose and need for this project and to be able to use Federal funding, the roadway needs to be reconstructed with an all-weather surface.

**Comment 7C:**

My apologies for not being able to attend the meeting on 4/20 but I am still in Illinois completing the course to become an EMT for the Rochford Volunteer Department. I have spoken to some of the attendees and wanted to offer my comments. The S Rochford Rd project has been a long and arduous journey. However, I think the process has been very in depth and has evaluated all the alternatives and researched all the impacts. As someone who lives in Rochford and owns property on South Rochford Road, I fully support the paving of the road. The road is in terrible condition and no amount of "band-aiding" will provide a long term solution. Sue Schwaneke

PS I tried to submit the comment from the website, but it wouldn't go through.

**Response 7C:** Comment noted.

**Comment 8C**

I support the selection of alternative #1 as a landowner who will be directly impacted. I request adoption of that alternative with construction to begin as soon as possible.

**Response 8C:** Comment noted.

**Comment 9C:**

If the cost of maintenance of this ten miles is 80,000 a year and you're proposing a nine million cost to rebuild, then the 80 thousand a year cost would cover 112 years of maintenance and this does not include the fact that you will still have to maintain the road. Our Federal government is so deep in debt now why would this Conservative county spend this federal money for this little used road. It seems to be a great waste of taxpayers' money. The locals refuse to pay taxes on their roads and bridges, as indicated in their refusal on the wheel tax, but they certainly don't seem to mind the rest of the American taxpayer shelling out this 9 million on their behalf. Perhaps we need a referendum to stop this rebuild. Although I doubt that any county resident would vote to stop it as only 1 330 millionth of the cost would be assessed to them. This road should remain the same as it has provided service over the last century. Time to stop wasting taxpayer's money just because it comes from the Feds.

Also I have driven that road for the last 50 years and appreciate the fact the it is not a straightened paved road. The fact that it is not paved makes it a special drive that will be lost if you complete this project. Sometimes it is better to make a drive just a little more difficult and remote. What you plan to do here is to spend taxpayers money to turn this into just another motorcycle route for the rally tourists.

Please leave this road just as it is. This drive makes that portion of our Black Hills special.

**Response 9C:**

*Maintenance costs*

By examining a gravel roadway segment with similar terrain within the immediate vicinity of the Project (Slate Prairie Road), it was concluded that South Rochford Road was experiencing higher than average maintenance costs. See the next section for additional information on Maintenance costs, and references to relevant sections of the EA.

As noted in Chapter 1, Referencing Figure 1-3, annual maintenance costs of other paved roads were reviewed in the process of developing the EA. Three sections of Deerfield Road were considered to have similar types of use, traffic volumes, and terrain. Each of these sections of roadway, showed lower annual maintenance costs than South Rochford Road, therefore based on this comparison, the cost for maintaining South Rochford Road after completion of the project would be reduced.

*Funding*

Refer to Response 7A.

**Comment 10C1:**

I have reviewed the South Rochford Road Project Number EM-BRF 6403(06), PCH OOCL dated February 2016. In the report I find subjective data on roadway maintenance and limited specific data on actual costs in relation to miles and cars using the roadway in comparison to other gravel roads. Section 1.2 is limited in the reasons for:

**Response 10C1:**

*Subjective Maintenance Costs*

Based on the Council on Environmental Quality, *Considering Cumulative Effects under the National Environmental Policy Act (1997)*, decisions must be based on the best data available or are able to collect. By examining gravel roadway segments having similar use, traffic volumes, terrain, and weather conditions in Pennington County, Slate Prairie Road was identified as the most comparable gravel roadway to South Rochford Road. A comparison of maintenance costs for these two roadways showed South Rochford Road was experiencing higher than average maintenance costs. Refer to Section 1.4.1 and response 11C2 for additional information on Maintenance costs.

**Comment 10C2:**

1. the "need to reduce the County's roadway maintenance costs". All counties must prioritize funding and be specific in why one road is chosen over other priorities. The recent experiments in mag water on gravel roads into Rochford have shown that it can be effective. There haven't been any specific fact sheets showing the cost of the proposed improvements and then the long term maintenance of that type of road. If an actual, current cost, specific cost fact sheet shows substantiated savings above quality maintenance of the current gravel road, then that is a good thing.

**Response 10C2:**

*Maintenance Costs*

Mag water is a generally a method used to suppress dust and may improve surface smoothness to some extent. Use of this substance or other similar products however would not address the 4 project needs identified in Section 1.2 of the EA.

Figure 1-3, annual maintenance costs based on cost per mile of other paved and graveled roads were independently reviewed in the process of developing the EA. Three sections of Deerfield Road were considered to have similar types of use, traffic volumes, terrain, and weather conditions. Pennington Counties historical records show each of these sections of roadway have lower annual maintenance costs than South Rochford Road, therefore based on this comparison, the cost for maintaining South Rochford Road after completion of the project would be reduced.

**Comment 10C3:**

2. the " need to correct geometric deficiencies along the roadway" has indicated the road is unsafe in certain spots. I am not sure this is totally substantiated but if it is, it should also include the approach to the Rochford Bridge which is noted during public meetings to be a dangerous hill during the winter. I didn't hear at the meetings that this area of the road would be directly impacted by the south Rochford road improvements. Again, if it is, then that is a good thing, too.

**Response 10C3:**

*Geometric Deficiencies*

Reference is made to Section 1.4.3 regarding the best information available regarding accidents. While the purpose and need for the project does not include safety, roadway reconstruction projects may improve safety. The design will make improvements to the roadway alignment to the extent possible [refer to Response 11A] while also considering and balancing environmental impacts. As noted in Figure 2-7 in the EA, reconstructing the hair-pin curve at the north end of the Project was considered as part of build Alternative 2 (see Figure 2-7, Inset A). After further review, elimination of the hair-pin curve was found to have substantial impacts to the Smith Gulch area, fens and wetlands. To avoid these impacts the design was modified to include minor alignment modifications in Alternative 1.

**Comment 10C4:**

3. the "need to provide roadway system linkage".....I have not seen any documented reasons by elected public officials in response to public outcry to have a paved road for South Rochford Road, with all the expenses, etc. therein, to provide for a linkage road.

**Response 10C4:**

*System Linkage*

Refer to Section 1.4.4 regarding the need for System Linkage. As noted in Section 1.4.1 of the EA, project funding was authorized under SAFETEA-LU, a continuation of the federal-aid highway program. Federal funds were authorized in the amount of \$9.0 million to reconstruct South Rochford Road at the requested by Pennington County.

**Comment 10C5:**

A Side Bar on page 1-1 of the 1.1 Section indicates "provide full disclosure of impacts". I do believe the data presented has done much in providing environmental impacts that may occur next to the road construction BUT it has done absolutely nothing to disclose the impacts that happen past the Rapid Creek Bridge where the actual construction project ends. These impacts will be felt by the local property owners as a potential increase in cars (which is apparently the purpose of the project) flows into Rochford, a tiny unincorporated hamlet in Pennington Co. Rochford has no elected officials and is represented by the Pennington County Commission. It is important that all county commissioners become fully aware of all the ramifications for such a tiny, historical component of the Black Hills. The only item that has been offered as a 'help' to this tiny, hoping to be preserved, ghost town, is "rumble strips" to alert the children and adults of the community to oncoming lumber trucks, cars, other vehicles and to alert the vehicle driver of 'something' coming up. This is a ludicrous and unacceptable way to approach the safety for the Rochford community members of proposed increased traffic. And, actually, even currently, the speed limit should be decreased to protect those walking on the Rochford Road.....the Reason any and all of us walk on the Rochford road is that there is no other alternative. If there are more cars, there will be more walking on the road because people will stop to enjoy the pristine beauty of the area.....hence a public safety domino effect.....(a potential way to slow down traffic even now is to use one of the flashing lights that alerts a motorist to how fast they are going in relation to the speed limit. The speed limit should be 15 miles/hour as drivers round the curve from the bridge into Rochford due to the road also being the sidewalk).

**Response 10C5:**

*Indirect Impacts to the Rochford Community*

The process and document analysis includes consideration of direct effects (those that are within the construction limits of the project) and indirect effects (those that occur outside of the project limits but are caused by the project). To specifically address the indirect effects to Rochford, this area was included in the Study Area with representatives from the Rochford Community being included in the Public Steering Committee.

A traffic analysis was completed based on the best information available, refer to Section 3.1.8, *How would the alternatives accommodate traffic, including motor vehicles, bicyclists, and pedestrians?* The impacts of traffic on Rochford was further discussed in Section 3.1.4.3.2 stating:

*Surfacing South Rochford Road would provide a regional link for tourism that would create traffic increases, especially during the Rally and summer tourism months (see Section 3.1.8). Though these increases exist today, the numbers would likely increase further and the durations may be longer, having an affect to the "ghost town" characteristic of the community. The affect would be adverse to those community members that enjoy the current atmosphere and desire to maintain the status quo.*

*The affect would be beneficial for any community members that may desire increased tourism in the area though no community or steering committee members expressed this desire. Increased traffic would be similar to what is experienced during events the community currently hosts as discussed in Section 3.1.4, Existing Environment.*

As noted, the traffic could increase as part of this Project; therefore mitigation was proposed to address community concerns. Refer to Response 3A regarding rumble strips and other mitigation.

**Comment 10C6:**

There have been comments made by the county highway dept and some others noted in this process that paving of South Rochford Road is important to motorcyclists and this, when really listened to, is a VERY subjective statement. Motorcyclists that I have specifically visited with and also observed anytime during the summer and also during the Rally, have no problem with knowing that South Rochford Road is gravel. Motorcyclists that take it serious, know how to drive the roads. And, long term motorcyclists are adamant about maintaining the integrity of the Rochford area. The real issue is the remoteness of the Rochford area for any assistance with accidents and this won't change with paving a road. It is this exact remoteness that is so vital to those that visit and love the Rochford area. It brings people to the area who appreciate the beauty of the Hills, which in itself is a very 'quiet' tourist area and wishes to remain in this realm. But, again, if the road is paved...It MUST include a Rochford community plan Made By Rochford Property Owners, Community Members and the County Commissioners, as our elected representatives.

**Response 10C6:**

*Motorcyclists*

Refer to Section 1.4 regarding the project purpose and need.

Reference is given to Sections 1.2 and 1.4.4 and 3.14 of the EA. This route is currently and will remain a public roadway open to both local and tourist traffic. Reference is given to Section 3.1.4.3.2 of the EA for a discussion on direct and indirect effects to the community's character and cohesion. Refer to response 10C5.

**Comment 10C7:**

Section 1.4.1.2.....I don't necessarily know a lot about frost heaves, although as a previous county commissioner myself, I do know that paved roads may also have issues and would encourage that to be very much considered if the road is paved. Any pot hole can be dangerous.

**Response 10C7:**

Refer to Response 11A.

**Comment 10C8:**

Section 1.4.4.....last paragraph appears to indicate that the current road is not an all weather road. It does appear to me that the gravel road coming into Rochford from Rapid City is gravel and is all winter/weather long.

**Response 10C8:**

An "all-weather surface roadway" is defined in Section 1.4 as roadway that "consists of a product such as cement or asphalt." A gravel roadway is not considered an all-weather surfaced roadway.

**Comment 10C9:**

Section 2.2.1.....It is noted that an FHWA project requires "Be usable and be a reasonable expenditure of public funds even if no additional transportation improvements in the area are made". It could be a stretch to call this a reasonable use of federal funds given the dollar amount and that upkeep of the road may entail as much county funding as the gravel road?

**Response 10C9:**

The section referenced is a discussion of establishing the logical termini and independent utility for the project. For the project to have independent utility, the improvements are stand-alone, without forcing other improvements which may have impacts. Also noted in Section 2.2.1, the Project Area was extended to Rochford to consider whether the roadway improvements would affect the community and extended south to the main intersection with Deerfield Road.

**Comment 10C10:**

Again, if paving South Rochford road is proven as a good idea with documented cost facts ( gravel maintenance vs. paved maintenance including cost of building the road) and documented not with just the currently noted narratives, then that may be a good thing.....BUT, lets be sure there is a plan for the unintended consequences that will Absolutely happen for the Rochford Community.

Thank you for your consideration of my comments. And, thank you to everyone who has worked on this Environmental Assessment and Evaluation over the past several years.

Property owner and year round cabin/home owner....  
and speaking for my family of 4 children, 6 grandchildren 3 great grandchildren and my 6 siblings who have property ownership and ties to Rochford for over 70 years. As a family we became a part of the Rochford community in the 1940s when my grandfather bought our first Rochford cabin property. He and several other local Rochford citizens were instrumental in the 1970s in assisting Rochford to become a townsite and several locals to have deeded property.

P.S.....when will the South Rochford Road new bridge over Rapid Creek be accomplished? It had been pulled out of the South Rochford Road project so it could be completed by 2016. It now appears to not be on the radar for this year? Is there another Steering Committee meeting planned?.....

**Response 10C10:**

*Rochford Road Bridge construction*

Refer to Response 7B.

*Plan for Steering Committee Meeting*

Final Steering Committee meeting was held 6/15/2016.

As a long term member of the Rochford community via all season visits, a granddaughter of Roy Armstrong who bought our original Rochford family/hunting cabin in ~1945 and who later assisted in Rochford becoming a town site, and as a current property owner on 4 contiguous lots on the west edge of the Rochford that are highly impacted by drive by traffic, I respectively submit my comments about the South Rochford Road (SRR) project. Admittedly, I am not only a Rochford landowner but also a former Brookings County Commission, a school board member and a legislator from District 7 and, in trying to review all aspects of this project, I try to keep the importance of public policy and future improvements in my comments. It is not always easy to gather adequate data and questions/concerns from the public about public projects. I do sincerely appreciate the opportunity this project provides to send you my concerns and challenges with the Rochford Road Project.

**Comment 11C:**

**Response 11C:** Comment noted.

1. I have not seen or heard any input from city leaders in Hill City or Deadwood/Lead at the 2 public meetings I have attended nor read their comments, as yet, in the project and meetings notes. In visiting with residents and visitors around and in Rochford, no one has indicated a desire for Rochford to be a thoroughfare for/from Hill City/Deerfield to Lead/Deadwood. It is inappropriate for Rochford, a long term and well respected ghost town, to be changed forever by using it as a thoroughfare for more traffic. There are already paved roads to these larger towns and Rochford businesses have not indicated any desire for economic outside of existing business already available in the unincorporated townsite. Once travelers reach Rochford from SRR, there is still another gravel road that goes to Rapid City. A 'loop' as such for the Sturgis Rally, if that is an acceptable reason for a multi million dollar road, still puts Rochford at a very major risk of losing its historic roots as the ghost town that it is. It is this quiet unincorporated, ghost town 'flavor of Rochford' that visitors from the Michelson Trail, families, tourists, bikers, etc. so enjoy.

**Comment 11C1:**

**Response 11C1:**

Reference Section 1.2 regarding the Project purpose and need.

Reference Section 1.4.4 System Linkage.

2. I have not seen current, substantiated costs of maintaining South Rochford Road as a well maintained gravel road. I have always found it important to have current, substantiated, costs and suggest the project obtain current and auditable costs from the county, with independent DOT assistance, that provide costs to maintain South Rochford road in the way that the county used to maintain it. From comments at the public meetings, it appears SSR maintenance was downgraded at about the same time that this project came on the radar. Rightfully so, it appears that the residents of the SRR area favor much improved dust control of this gravel road. This is a reaction that we all have. It has been

noted at the public meetings that dust control was better in the past when the county maintained the road adequately for dust. It is unclear why this didn't continue.

**Comment 11C2:**

**Response 11C2:**

Refer to Response 10C2.

3. I have been at 2 public meetings. Sometimes it appears that building the paved road is the only thing being considered and not considering the no build option or comparing costs of the 2 build alternatives to how the road was maintained prior to the SRR project. The costs of patrolling, upkeep of the paved road, frost heaves of a paved road, impact on Rochford and other costs could be part of the discussion and graphed along side the costs of excellent maintenance of a gravel road.

Dust and the upgrading of the curves that are a winter problem near the Rochford bridge are the 2 problems that I have heard at the meetings and in talking with Rochford area residents.

**Comment 11C3:**

**Response 11C3:**

Reference Section 1.4.1 and Figure 1-3 for historical maintenance costs of gravel verses all-weather surfaced roadways in Pennington County.

4. The area of the SRR project that I have heard area landowners discuss at meetings and in person as a big problem is: wintertime and the curves just before the Rochford bridge. And, in listening at the meetings, I am not convinced that either build alternative adequately addresses this verbalized concern by landowners in the area. It appears an adequate solution to this winter time problem is largely in the hands of the county and outside of this project.

**Comment 11C4:**

**Response 11C4:**

Refer to response 11C3.

5. There hasn't been any discussion at public meetings and no qualitative or quantitative studies on what increased traffic, if this road increases traffic, will do to the unincorporated Rochford town site or the impact upon the safety of the residents therein. The Rochford town site effect is listed as a component of the project and has not been adequately or measurably addressed. I would suggest much more research on the short and long term effects to Rochford and that it become an important, researchable topic.

**Comment 11C5:**

**Response 11C5:**

Refer to response 10C5.

6. I visited with a Rochford Road area rancher in mid August as he was driving by my cabin and stopped to visit. He very much noted to me that he is not in favor of the paving of the road, nor did he think many in Hill City were in favor either. But, he would like to see the road maintenance back to what it used to be.

**Comment 11C6:**

**Response 11C6:**

Comment noted.

7. The traffic/road safety of my family including 4 grown children, 6 grandchildren and 3 great grandchildren, as well as extended family and friends is a very big concern for me in the family cabins. There are no sidewalks, guard rails, etc. as cars drive around from the SRR bridge into Rochford. The landscape of the area has not allowed for this nor am I asking to have the landscape changed in any way. A fact is that all my family property is directly alongside the road and family members, friends and members of the Rochford community walk along the road on a daily basis and several times during the day. It is currently and can be an even bigger safety risk with traffic, much less with more traffic. And,

widening the road, adding sidewalks and all the 'usual' ways of improving safety are very limited given Rapid Creek on one side and my extended property lines on the other side of the existing roadway.

**Comment 11C7:**

**Response 11C7:**

Refer to Response 3A.

8. Historically, there is much to be lost in the rock wall along the Rochford creek side and along 2 of my cabins. These rock walls have been there for approximately 100 years to the best of my estimation. The result of the SRR project can only negatively impact these walls.

At this time, we have not had any information on how the county would re-do the road through Rochford. My suggestion would be to have that plan discussed fully as part of the SRR plan so that we know upfront how the road will change through Rochford. I haven't seen any information being presented from the bridge, which is where it is noted that the project 'ends', to the Rochford church and to the Lawrence Co. line. I do believe that this should be discussed as part of the studies of the SRR project.

**Comment 11C8:**

**Response 11C8:**

The project terminates at the Rapid Creek Bridge. No roadway work within the community of Rochford is considered as part of this action.

I do want to thank all those who are in the midst of studying the SRR project alternatives and thank them for the opportunity to submit my personal thoughts on the project. I do hope that the outcomes of the SRR studies serve the people of the SRR area well and take us into the future in the best way possible.

**Comment 11C9:**

**Response 11C8:**

Comment noted.

As to the work on the road, we believe that the less intrusive approach of simply upgrading the road along the existing right of way is the preferred approach over straightening, widening and fully paving the road. Under your plan, we understand that it is the less intrusive method that you are planning to follow. We are in the process of reintroducing buffalo to Pe Sla, so we recommend that the project include warning signs for buffalo and buffalo grates at the entrances and exits to the main areas of the property including the ranch house site.

**Comment 12C1:**

**Response 12C1:**

*Preferred Alternative*

Section 2.2.2.2, states that Preferred Alternative 1 includes all-weather surfacing of the existing South Rochford Road, with horizontal and vertical curve changes mainly within the existing ROW along with improvements to drainage in select locations.

The roadway will include some type of finished surface under this alternative. There will be minor amounts of ROW acquisition under the preferred alternative.

*Buffalo Signs*

The need for signing and fencing of ROW will be considered during final design.

*Buffalo Grates*

Inclusion of grates at private residences will be discussed as part of any ROW agreements.

**Comment 12C2:**

We believe that the TCPs on and near Pe Sla are very important and significant because they reflect the culture, traditions and history of the Lakota, Nakota, Dakota Oyate in this area. Accordingly, we urge you to do everything possible to protect and preserve Tribal Traditional Cultural Properties on and near Pe Sla. Under your plan, we understand that you and the State of South Dakota Historic Preservation Office will consult with the Tribal Historic Preservation Offices concerning the possible disturbance of TCPs. The main concern is the potential for inadvertent discoveries wherever there is any sub-surface disturbance and the THPOs should be the first to be notified.

**Response 12C2:**

We will continue to involve interested tribes in the preservation of Traditional Cultural Properties (TCPs) that may be associated with this project. Stipulations and mitigation included in the executed MOA to resolve adverse effects regarding South Rochford Road and the Historic Property Monitoring for Discoveries and Treatment Plan along with any revisions that may be necessary to address future changes to jurisdictional authorization will be followed to both preserve known TCPs and address treatment of inadvertent discoveries.

**Comment 13C:**

As Rochford road residents, we were unable to attend the April meeting. We were told the project is dead. Is that true?

Thank you, to bad. It was a good safe healthy project.

**Response 13C:**

FHWA, SDDOT, and Pennington County will consider all comments received on the project in a timely manner. The EA document is available on the web at <http://www.southrochfordroad.com/resources/> (South Rochford Road EA | Resources).