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February 20, 2023

Powder River Ranger District  
Bighorn National Forest

**Re: Scoping Notice, Pole Creek Vegetative Management Project**

Ladies and Gentlemen,

For nearly 25 years, part of my area of responsibility as Biologist and later, Wildlife Management Coordinator, with the Wyoming Game and Fish Department, included the east side of the Bighorn Mountain. I began in Sheridan in 1970, so I know much of the history of the forest management and served on committees that prepared the first Forest Plan and then the first revision. Wildlife is my primary concern, but now, in retirement, there are some additional interests.

I have some concerns about this proposed plan, but I would like to begin with some supportive comments:

1. I appreciate the honoring of the Roadless Area regulations in spirit and as required.
2. Aspen is an unique vegetative type on the Bighorns and their maintenance provides important wildlife habitat as well as scenic value.

My concerns are as follows:

1. The commercial harvest of trees over 9,000 acres is excessive. As stated in the Scoping Document introduction, "... this area has experienced more road building and timber harvest than many other areas of the Bighorn National Forest." I would argue, *more* than any other area of this project size. Serious Commercial timber harvesting began in 1964 in that area and continued into the early 1990's. Most were clear cuts in lodgepole, so there has been 30 to 60 years for regrowth – not enough to grow a mature lodgepole. So that brings into question, are you meeting the Old Growth standards and the Elk Security standards in the Vegetation Units that are within the project area? I do not see how you can be.
2. Hiding cover for elk is another issue. An objective of the Forest Plan is to provide "diverse, high-quality outdoor recreation opportunities." I believe that includes elk hunting, but without sufficient hiding (escape) cover, hunting quality will decline. That was the case in the 1990's when elk numbers declined in Elk Area 35 west of Buffalo and elk licenses were greatly reduced. Are you going to repeat history?
3. Pre-commercial timber thinning planned for about 2,000 acres is a good management tool in many places, but many techniques have been tried. I was invited to observe the results of three or four thinning projects and I believe all created significant barriers to wildlife and humans, were unsightly AND were not cost efficient.

That brings economics into the picture. True, locals were employed to harvest the timber and cut it up, but I'm not aware of any timber sales on the Bighorns that produced a profit for the Forest. I agree, forest management has a value as does using a resource, not wasting it, but when other resources are negatively impacted, such as recreation and scenic values that are more valuable to the public, timber

harvest should be done very carefully. In the Pole Creek Vegetative Management Area, there has been an over-abundance of timber harvesting and as a taxpayer, I'm concerned about where my tax money is going.

4. Tree Planting is identified as an Associated Activity and I see there are some timber areas identified on the east side of Hesse and Hazelton Peaks. A few areas were clear cut in those near here years ago and there was almost no regeneration and tree planting was not very successful, either. A review of the timber harvest files for those cuts there and the regeneration might be helpful to you.
5. Road changes proposed, by my calculation, come out to 10.48 miles of road closed by gates and 0.71 new roads opened. In the practical sense, a gate does not stop 4-wheelers from going around the gates and using the roads. So, the road is open for some, though in most cases, does not have to be maintained. The Forest Plan identified a goal of closing and I believe decommissioning, 4 miles of road per year. I still get around on the Forest and I read the newspapers. There doesn't seem to be much effort to close roads and I question the roads plan in this proposal. I do believe the FS Enforcement Branch does what they can to enforce road closures, but the rest of the Forest has little will to close roads. The Pole Creek Project area is heavily roaded now. I believe it is at or over the road density goal of the Forest Plan. It's easy to promise closures, more difficult to achieve closures. I don't see closures happening. And you do not now nor have you had the funds to maintain the roads that need maintenance now!
6. Watershed improvement and fire reduction are identified in Purpose and Need for Action. These sound like great objectives, but are they supported by literature? I don't have the answer to these questions, but you should. I doubt that either watershed improvement or fire reduction will occur. I believe the Rocky Mountain Forest and Range Experiment Station, and other sources, have reported no watershed yield from timber harvest. The Buffalo, WY Water Treatment Plant proved that they can handle siltation from a large fire far more cheaply than forest management can accomplish the same outcome, clean water. It seems much of this project is a waste of a lot of money that could be put to better use.

Fires can not be avoided and with the climate becoming warmer, I would anticipate more fires. Often, even with full fire suppression efforts, fires continue until natural circumstances put them out or provide an opportunity for suppression efforts to work. I would like to know what literature sources you have that support these objectives of the Pole Creek Vegetation Project.

I just have one more comment: In reading the proposal and studying the maps, it seems painfully clear that the writers AND the reviewers have not availed themselves of the history of the Forest and Forest timber management. Nor are you aware of the details of the Forest Plan. Both of these apparent conditions are disheartening for the future of the Bighorn National Forest. You were entrusted as professional, with management of the Forest when you were hired.

Sincerely,

Roger W. Wilson