



Intermountain Forest Association

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Thad Berrett
District Ranger
Bighorn National Forest
Buffalo, WY 82834

Mr. Berrett:

This letter is in response to the request for comments to the scoping notice for the Pole Creek Project (PCP). The Intermountain Forest Association (IFA) and its members appreciate this opportunity to provide comments.

IFA appreciates efforts, including the PCP, by the BNF to proactively mitigate ecologically and socially damaging effects from wildfires and insect epidemics. National forests across the West have witnessed catastrophic wildfires and insect epidemics that highlight the repercussions of not proactively managing forest resources on landscape scales. The idea of forests as static systems has resulted in tremendous impacts to multiple uses on other national forests and we appreciate the BNF taking action to reduce the likelihood of such impacts in the project area.

Purpose and Need

IFA agrees with purpose and need as identified in the scoping notice for the PCP. Promoting healthy forested ecosystems and management actions to move the forest in that direction, with the long-view in mind, is the first priority for IFA and our members. However, IFA also appreciates the recognition of societal needs as described in the purpose and need and the recognition that management actions can increase tree and forest growth and vigor.

Proposed Actions

Although IFA generally supports the proposed actions, we do have recommendations to the BNF that may increase opportunities to better meet the purpose and need.

- The total proposed treatment acres, including commercial, pre-commercial, and fuels, adds up to less than half of the suited acres within the project area and less than 18 percent of the total project area. Treating such a small portion of the acres increases the difficulty in meeting the purpose and need. We understand the difficulties with implementing activities within roadless areas, but believe that amplifies the need to maximize the treatment area within the suited base acres and other areas with less restrictions. In certain instances, resource conflicts on certain acres can be mitigated with timing, seasonal, trail protection, or other components of sale design. Treating a greater proportion of the suited acres, maximizing the total acres treated, should be a priority for the BNF.
- IFA encourages the BNF to closely examine opportunities to reduce wildfire risk in roadless areas and to use all authorities available. We also recognize that much of the work may require long forwarding distances or additional work which will likely result in most operations being classified as non-commercial and requiring service contracts – or other contracts apart from traditional commercial timber contracts. Additionally, we encourage the BNF to interpret the classification of “generally small diameter timber” in the roadless rule using comparisons to “large” trees referenced in the BNF Forest Plan. As an example, the BNF Forest Plan references Mehl (1992) in the definition of late succession and old growth found in the glossary section and relies on Mehl (1992) in the reference to “large diameter trees”. Mehl (1992) indicates a diameter of 10 inches for old growth lodgepole pine. In the same synopsis publication, Robertson suggests a *QMD* of 10.5 inches for lodgepole pine. We encourage the BNF to determine “generally small diameter timber” comparatively.

Late Succession

Ecosystems distinguished by old trees and related structural features. This term encompasses the later stages of stand development that typically differ from earlier stages in structure, composition, function and other attributes (Kaufmann et al. 1992). The term is also associated with “old growth.” The composition of late successional stands on the Bighorn were described by Mehl (1992), and vary according to cover type. They usually involve older, large diameter trees.

From the BNF Forest Plan

- IFA is a strong supporter of prescribed fire where appropriate and applauds the BNF for primarily targeting areas not accessible for management via mechanical harvest methods, as indicated in the PCP scoping. However, we also believe that prescribed fire should be analyzed with the same rigor as mechanical management methods. With that

in mind, neither the scoping notice, nor the maps, indicate where or how many acres are being proposed for prescribed fire. The scoping notice does not indicate what the current conditions and desired conditions consist of where prescribed fire is proposed. IFA strongly suggests more in-depth analysis of proposed prescribed fire treatments with clear, measurable metrics in the NEPA for implementation.

- IFA appreciates and supports the BNF utilizing administrative road closures in lieu of road decommissioning, as described in the proposed actions for the PCP. We also agree with the finding of the BNF that constructed, but closed, roads benefit the BNF, and fire suppression and planning activities.

IFA appreciates the opportunity to comment on the PCP and welcomes any further discussion from any BNF staff.

Thank You,

A handwritten signature in black ink, appearing to read "Ben Wudtke", with a long, sweeping horizontal stroke extending to the right.

Ben Wudtke
Executive Director

References

Mehl, M.S. 1992. old-growth descriptions for the major forest cover types in the Rocky Mountain Region. Pp. 106-120, In: Kaufmann, M.R., W.H. Moir and R.L. Bassett, (Tech. Coord.), old-growth forests in the Southwest and Rocky Mountain Regions, [Workshop Proceedings], USDA Forest Service Gen. Tech. Rpt. RM-13

Robertson, P.A. 1992. Characteristics of spruce-fir and lodgepole pine old-growth stands in the Arapaho-Roosevelt National Forest, Colorado. Pp 128-134. In: Kaufmann, M.R., W.H. Moir and R.L. Bassett, (Tech. Coord.), old-growth forests in the Southwest and Rocky Mountain Regions, [Workshop Proceedings], USDA Forest Service Gen. Tech. Rpt. RM13