



**Powder Pass Nordic Club**

<http://www.powderpassnordic.org>

[powderpassnordic@gmail.com](mailto:powderpassnordic@gmail.com)

*Powder Pass Nordic Club is a 501(c)4 tax exempt all-volunteer organization whose purpose is to support cross-country skiing and snowshoeing activities that encourage camaraderie while fostering an awareness of safe winter recreation and stewardship of the land.*

Dear Mr. Thad Berrett:

Thank you for the opportunity to object the Pole Creek Vegetation Management Project #61834. I am submitting the following objection and comments on behalf of Powder Pass Nordic Club.

Sincerely,

Charlotte Darling  
Secretary  
Powder Pass Nordic Club



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Dear Thad Berrett, Responsible Official:

Thank you for completing the Pole Creek Vegetation Management Project #61834 EA, FONSI, and DN. Powder Pass Nordic Club appreciates the Forest Service's modifications to the project following the initial scoping period.

The changes that have been incorporated thus far are encouraging, however PPNC still objects to portions of the Pole Creek Vegetation Management Plan. The dozens of public comments received from individuals, businesses, community organizations, and elected officials clearly demonstrated the significant economic value of winter recreation across the project area, and particularly at Pole Creek Nordic area. Over the past 12 years, nearly \$200,000 in financial contributions from the Johnson County Recreation District, the Johnson County Tourism Board, and local private donations have been invested in equipment and improvements to the area. In addition, almost \$100,000 in volunteer labor (or 4,000 hours of community members' time) has gone into its maintenance. Putting these substantial community investments at risk for a few more acres of timber harvest is an insult to both local and national taxpayers, and the wider community that values this unique recreational resource.

As noted in our prior comments, PPNC's highest priority for the ski trails in the project area (Pole Creek Nordic area and the Powder Pass 449 area) is maintaining or enhancing snow accumulation on the trails, and not jeopardizing it. We and many others specifically commented on this, but do not feel it was adequately addressed in the EA. We recognize that thinning and timber projects may enhance the ski areas over time with proper management, and to ensure a successful outcome for all, we request that the following objections and suggestions be addressed:

**Remove Timber Harvest Units and Other Treatments from the S-5/Pole Creek Nordic Area and Powder Pass 449 Area**

Removing some or all treatments, including TH units 011, 012, 020, 053, 064, 065, 068, 072, and 078 from the Pole Creek and Powder Pass ski areas will allow natural forest regeneration processes to occur and will affect snow patterns more gradually than human treatments.

PPNC appreciates the changes to treatment units within the Pole Creek Nordic area, and the application of 200 foot buffers to the ski trails to prevent adverse effects. However, we feel that these buffers are still insufficient to protect the ski trails, particularly on the west side of the ski area. The prevailing winds in the Pole Creek Nordic area are from the northwest, and can be very severe during the winter. Timber Harvest Units 011 & 012 are in this windward location, and currently provide a windbreak for the ski trails immediately adjacent to them, as well as a buffer for the entire ski area. Clearcutting these units may ruin the ski trails on the western edge of the Pole Creek Nordic area, where trees are needed to keep the snow from blowing away. The removal of trees will likely have a scouring effect adjacent to the ski area that will make skiing portions of the trails impossible for many years, until new trees grow large enough to provide a windbreak.

In addition, the opening of the meadow in Unit 011 will reduce snow availability on a key connector trail that already has trouble keeping deep snow through the winter due to its exposure. Thus, PPNC requests complete removal of units 011, 012, and the northeast portion of unit 20 from the project. If removal of the units in the Pole Creek Area is not feasible, a more substantial buffer of at least 500-1000 feet is requested.

### **Unexplained Changes to Powder Pass 449 Area**

After reviewing maps from scoping and from the EA, it appears the size of the treatment areas in the Powder Pass 449 non-motorized area have been increased. This increase will heavily impact both winter and summer recreationists using the Powder Pass 449 area and Sheep Mountain road, and trails in that area may not be skiable for some time after treatments. Please provide an explanation and justification for this increase.

### **Thinning and WUI**

PPNC recognizes the importance of WUI treatments to protect human safety. However, we request that WUI treatments in the Pole Creek Nordic Area be minimized, with as little tree removal and impact to the ski trails as possible. WUI buffers, particularly around the WYDOT Camp, Cow Camp Cabin, and Pole Creek Cabin should be reduced from the default  $\frac{1}{3}$  mile to protect the integrity and economic value of both these structures and the ski trails. Recognition of the economic value of the trails should be fully considered when designing protection plans for structures of varying quality and condition. We suggest minimizing WUI treatments within 200 feet of trails to maintain scenic value and to help hold snow. We request that these design features be described in detail in Appendix A.

### **Treatment Effects Analysis**

We do not feel it is appropriate to lump the effects of all types of mechanical and hand treatments together in the analysis for scenery and recreation. The effects of a thinning project or overstory removal are not the same as a clearcut, especially for recreation purposes, and specifically for cross-country skiing. The effects of each type of treatment should be broken out and described more fully in the EA and its appendices.

### **Design Features, Collaboration, & Mitigation**

The project changes and design features agreed upon during PPNC's on-site visit with Forest Service staff on March 1, 2023 are not readily apparent in the EA, Decision, Effects Analyses, or Appendices. Recreation values are mentioned, but scenery objectives are the primary items addressed. The Recreation Effects Analysis and Appendix A, Design Features, Recreation #8 reference "attached Recreation and Scenery Management Standard Operating Procedures", but these are not included in the documents available to the public. The Forest Service provided this document upon request, however, the lack of transparency and absence of this information in the NEPA documents is concerning.

We request that all design features relevant to the ski areas are laid out specifically in the EA and/or its appendices and the Decision to ensure that these features are carried forward as treatments are implemented. Changing staff, priorities, and workload can mean that stipulations and design features are not carried forward in projects with long implementation timelines. The Pole Creek Vegetation Management Project is expected to unfold over 15 years—having these critical design features clearly listed in the documents will avoid errors in setting up treatments.

Additionally, maps provided to PPNC by the Forest Service do not accurately reflect the ski trails at Pole Creek, and are not consistent with what is approved and groomed, present on the landscape, and used in scoping

documents. Particularly, the A1 and Kessler's Crook trails are missing. We are concerned about the potential effects to these trails from Harvest Unit 7, and are concerned that USFS does not have consistent and correct information for their management. If staff laying out treatment units do not have accurate information, the results to the trail system could be devastating.

In light of the lack of transparency in the NEPA documents, inconsistencies in mapping, and the **significant** public investment in and economic value of the ski area to the local community, PPNC requests the following as the Pole Creek Vegetation Management Project is implemented:

- Notification and coordination with PPNC during planning, advertisement, and implementation of projects in order to ensure USFS follows its stated plans and stipulations. A relatively small mistake in cutting down half an acre of trees can take half a century to repair. The damage is done quickly and recovery is slow.
- Partner with PPNC on the unit layout and cutting prescriptions in treatments overlapping the ski areas. We understand this would be a lot of work on our part but could further our partnership with the Forest Service. It is also consistent with the mutual benefit goals of our Challenge Cost Share Agreement.
- Mitigations would be applied if new wind scour patterns prevent snow accumulation on the ski trails. For example, USFS would agree to build wooden snow fences (similar to the ones on highways) to capture snow, or agree to make strategic windrows of slash to help catch snow.
- Second entry thinning of regen in commercial units to maximize crown size and tree longevity in new canopies.

#### **Designate Pole Creek Nordic Area and Powder Pass 449 as Winter Sports Areas**

Dozens of comments on this project, including those of PPNC, requested that Pole Creek Nordic and the Powder Pass 449 areas be designated as winter sports areas. The extensive public investment in and usage of these areas plainly suggests that formal designation is needed to protect them into the future. There is clear demand from the public, local businesses, organizations, and governmental bodies for this designation to occur, and we do not feel that this comment was adequately addressed. There is a demonstrated need to protect these areas for non-motorized winter recreation use and exempt them from land uses that would destroy their recreational value. The Forest Service's own initial plans for the Pole Creek Vegetation project would have decimated these areas, which was a shock to the local community, as evidenced by the many comments submitted in support of these ski areas. The public outcry in response to the initial proposal is evidence that these areas hold a significant value as currently managed, and they must be protected as such.

The Forest Service has not provided guidance in how to have the areas designated. If there is a specific process to make a proposal, PPNC requests guidance on how to make a formal proposal and requests that the process to designate this area begins now. This is in accordance with challenge cost share agreement Term IV. (B): "The U.S. Forest Service Shall...Process new project requests in a timely manner."

*Thank you for your time and attention and the opportunity to comment on this project and object to its current iteration. If you have any questions regarding the items discussed above, please contact Powder Pass Nordic Club at [powderpassnordic@gmail.com](mailto:powderpassnordic@gmail.com).*