

Data Submitted (UTC 11): 2/21/2023 7:00:00 AM

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February 21, 2023

The Council for the Bighorn Range welcomes this opportunity to comment on the Bighorn National Forest Pole Creek Vegetation Management Project in the Powder River Range District, Wyoming.

[<https://www.fs.usda.gov/projects/bighorn/landmanagement/projects>].

Background

The Pole Creek Vegetation Management Project of approximately 92,000 acres is mainly contained within the Clear Creek/Crazy Woman Creek watershed. Roughly 37,000 acres of land classified as suitable for timber production are located within this project area. There are also almost 33,000 acres designated as inventoried roadless areas.

Its most significant feature is the 2001 Roadless Area Conservation Rule (RACR) lands of the Bighorn NF at 620, 663 acres of the 1,198,080 acres. The topography of Bighorn NF has delivered most of the suitable timber in Forest Service analysis in the areas most critical for wildlife habitat and watersheds.

The Council for Bighorn Range (CBR) agrees historically, this area of the Forest has seen more road building and timber harvesting than many other areas of the Bighorn National Forest, both in Open Road Density and Total Road Density. (BNF 2055 DEIS 3-117). That is 1.5 times greater than the closest other areas is agreed that significant timber harvesting dates back to the late 19th-century railroad tie era, and large-scale 20th-century forest management peaked from the 1950s to 1980s. Failure to reach FS regeneration standards in the Clear/Crazy watershed upset the BNF timber program in the area for years after a successful lawsuit for the non-compliance.

The Pole Creek VMP in the Crazy Woman Geographic Area is also home to historic campgrounds and recreation sites constructed during the 1930s for motorized use. The overriding resource use is recreation from dispersed camping, designated campgrounds, motorized trails, a Nordic Ski Area, portals to the Cloud Peak Wilderness, and miles of both system and user-created historic byways. In addition, the parks and riparian corridors in the project area's southern portion are essential for wildlife observation and taking.

The 2023 fuels' emphasis on a vegetative management plan conflicts with those industrial-scale prescriptions with the Bighorn NF 2005 Forest Plan Management Area objectives.

The scope and complexity of the Pole Creek Vegetation Management Project preclude a categorical exclusion and decision memo. However, all management needs to factor into the Environmental Analysis EA, including actions by State Agencies on federally managed public lands.

1 | Page

The Council for Bighorn Range (CBR) contends that the project area has a recreational, watershed, and wildlife resource emphasis in this century. Along with large areas to the North of US 16 in the Management Area 5.13. Area not included in the 5.x MA's are 4.2 Scenery, 3.5 Wildlife and Plant Habitat Management. The scope and breadth of the Pole Creek VMP scoping document is to turn the remainder of the Clear/Crazy watershed into a fuels reduction farm without regard to the other management direction of the 2005 land Resource Management Plan.

season. Private land developments, primarily cabins continue to expand near the Forest boundary, particularly within the Billy Creek, Hazelton, and Dull Knife areas.

Purpose and need for action.

Proposed actions.

The primary treatments included in the proposed action are commercial timber harvesting, prescribed burning, pre-commercial stand improvement thinning, non-commercial fuel reduction thinning, aspen/riparian habitat restoration, and changes to the permanent road system.

Our primary concerns s on the proposed Actions:

- * Commercial harvest treatments (9,000 acres) and pre-commercial timber improvement thinning of immature stand (2,000 acres) are being proposed on about 9,000 acres. Re-entry from the commercial harvest in Lodgepole pine tracts in the project area is at what stage? Is this the second or even third commercial treatment over how many decades to produce a merchantable product? Recent sales contracts managed by the Wyoming Department of Forestry in the Hettinger GCA yielded less than \$600 a ton while thinning contracts in the Bighorn NF run \$1500-\$3000 per acre (Warder Bornong). That figure does not reflect the miles of the new Class 5 construction and Class 4 upgrades outlined in this project. Seeding to market for Lodgepole pine on the Bighorn NF is 70-100 years.

- * Prescribed broadcast burning could occur within the project area boundary. Prescribed burning treatments would be in areas conducive to implementation processes and conditions established within the Prescribed Fire Burn Plan.

- * Aspen stands enhancement treatments could occur on up to approximately 800 acres. Treatment options include felling of encroaching conifers from within and surrounding aspen stands. There are inadequate safeguards on the State of Wyoming as the contractor on this Aspen treatment in IRA's where ORV support vehicles create openings and tracks that invite public use. This particularly concerns the Taylor-Doyle Creek and Poison Creek undeveloped and IRA acres.

- * Improvement of riparian and aquatic habitats through non-commercial tree felling or thinning of conifers is proposed and could occur on up to approximately 8,300 acres. Bighorn NF guidelines require setbacks of 300' or more from streambeds. This needs to be written into every sale and project. Any riparian enhancement work within inventoried roadless areas would not involve road building. Other riparian area restoration activities

2 | P a g e

may include stream bank restoration, aquatic organism passage installation, beaver dam analogs (human-facilitated beaver dams), and planting native riparian species.

- * Improvement, repair, or replacement of degraded or improperly functioning stream road crossings could occur. For example, sediment sources from existing roads and trails would be reduced or eliminated by installing culverts, armored stream crossings, adding riprap, or other stabilization methods in riparian areas. In addition, roads and other sediment-producing features may be modified to prevent sediment loads from affecting water quality. Many of the treatments will reduce elk security habitat within the project area, in accordance with the forest plan (2005) to maintain elk security acres following timber harvest. The BNF and Wyoming Department of Forestry have embarrassed themselves and insulted the public with photos of elk on Class 5 roads to claim that the large animals thrive on roads. Forest roads are widely recognized for environmental impacts and risks. The 2015 "Bighorn

Forest roads are widely recognized for environmental impacts and risks. The 2015 "Bighorn National Forest Travel Analysis Report" states: Environmental impacts or risks from motor vehicle use, including impacts to water resources, soil erosion, and risks from geologic hazards (e.g., landslides), concerns about fragmentation and wildlife security, impacts on vegetation

(specifically, introduction and spread of noxious weeds), and impacts on cultural resources. The work has been done, and the Bighorn NF falls very short on decommissioning roads based on the multi-resource work in the Powder River Ranger District.

Proposed Actions on Roads in the Project Area.

{{insert own road commissions-decommission list.}}

Associated Activities: CBR Concerns

- * To provide short-term access to timber harvest areas, an estimated 25 to 28 miles of temporary roads may need to be constructed to move products to the permanent road system.

- * Forest Service roads needed for the hauling of commercial forest products would receive deferred maintenance or reconstruction work to allow for the safe and efficient removal of products while protecting environmental resources.

The Powder River Ranger District has failed to protect our Forest from abuses by contractors operating on WDF timber projects. (Hazelton Road - Johnson County). Why not object to projects when the District has failed now or in the future?

Whose guidance is being use followed in the determination of WUIs?

In the February public meeting on the Pole Creek VMP, both the Fire Officer and the ID Team member from the State Forestry talked on defending the landowners against threats from the Forest.

3 | P a g e

Fuel reduction thinning of dense Forest stands in the wildland-urban interface (WUI) areas is proposed to provide defensible space on up to 5,400 acres. However, the WUI arcs scattered throughout the project are excessive, especially in wildlife emphasis areas.

Thinning and burning piles in the Tie Hack Campground in 2021 did little to enhance forest health or public safety.

Why are sites identified in the Scoping map for structures that no longer exist? A fire tower on a rocky abutment? The Doyle and Taylor Creek spur on the boundary area is covered in proposed WUI treatments on lands managed as Plant and Wildlife Management under the Forest Plan and seem excluded from environmental assessment. Poison Creek and Billy Creek areas are in Rangeland emphasis. Intense fire management as practiced by State of Wyoming introduces a myriad of issues from disturbance making way for invasive grasses and degraded watersheds. The Forest lands are managed for multiple use in better stewardship than many of the single production of livestock or residential development.

Reviewing the proposed treatments, the 1/3-mile survivable space buffer area is quite out of bounds. U.S. Forest Service fire science research states that defensible space must only be 100 to 200 feet from a structure. In a USDA Forest Service Rocky Mountain Research Center article dated July 12, 2016, Jack Cohen concluded, "This area around the home that primarily determines home ignitions is called the home ignition zone (HIZ). The HIZ includes the home and vegetation, outbuildings, and neighboring houses in the immediate surroundings within 100 feet of the home. Research shows that most home destruction is associated with burning embers [firebrands] and low-intensity surface fires contacting the home, not the big flames of intense wildfires." It is more likely that a shower of firebrands lofted into the air ahead of the wildfire and landing on homes or the immediate surroundings results in home destruction. Thus, reducing home ignition within the HIZ is the most effective homeowner action for preventing home ignitions during wildfires. Jack D. Cohen is a retired research physical scientist for the USDA Forest Service at the Rocky Mountain Research Station's Fire, Fuel, and Smoke sciences program. What research supports this extreme distance of 1700 feet for survivable space, which is 8 to 16 times greater than the research done by the US Forest Service? [Craig Cope -2023]

4 | P a g e

Figure 1 Tie Hack Campground - WUI

Tie Hack Campground after treatment. 2021

Campers visit campgrounds to enjoy the outdoors in the shade. Removal of trees, as was done in Tie Hack campground, leads to wind throw. The canopy was opened, making wind throw more likely, creating unpleasant camping conditions at the opening in spring. Creating a windfall hazard in a developed site would expose the BNF to the liability of injuring visitors or worse. The BNF must practice tree management in developed sites, not timber management. The proposed partial harvest and WUI treatments near the Doyle Creek Campground will lead to wind throw in this area. The cuts will obliterate the ATV trails east of the Campground. These were created in the Clear/Crazy TM EA to provide visitor access while closing the road paralleling Doyle Creek. Closing the road along the creek reduced sedimentation into the creek. The BNF should prepare the vegetation management plans listed in the LRMP as a goal if they have not done so for Doyle Creek Campground. Due to the blowdown, the public does not want to camp in a timber sale or the resulting opening. Has the BNF prepared any vegetation management plans for developed recreation sites? That would appear to make more sense than just going to a developed site and reducing canopy cover as this picture.

5 | Page

Figure 2 Buffalo MWP Powder River RD

Photo: Elgin park Area from the Buffalo Municipal Watershed Project (BMW)

Other Wildlife:

Areas of elk calving habitat exist within portions of the project area, and blocks of relatively remote, dense Forest serve as security areas that help to retain elk herds in the National Forest into the fall.

RACR

Portions of the Pole Creek project are within the Cloud Peak Contiguous, Hazelton Peaks, and Doyle Creek Inventoried Roadless Areas, and the Elgin Park (FSR 460) road runs adjacent to the Grommund Creek roadless area. Areas of proposed WUI fuel reduction thinning and aspen and riparian area restoration treatments that involve tree cutting, are planned within these roadless areas. The tree cutting associated with these actions must only occur to the extent it is consistent with the exceptions listed in the federal regulations governing the Protection of Inventoried Roadless Areas (36 CFR Title 36.. historic use in these areas left discernable tracks and exist on public maps. Project work on these lands should be directed to minimize any improvement on these tracks that would in future encourage public use.

Good Neighbor Authority and extension of private land management by State Agencies.

The Wyoming Division of Forestry obliterated large tracts of State Trust land in the southern reaches of Crazy Creek and Bull Creek. Overflights along the east front of the range show randomly rectangular clear cuts on State Trust land. What kind of agreements are in these stewardship contracts on the boundary areas along the south and east of this project area. Will the Bighorn NF include those areas, mostly overreaching WUIs, and containing significant riparian zones, in the surveys during the summer of 2023? The governing document for State resource agency is Title 36, not multiple use, nor a state

6 | Page

environmental act. Nor is public input welcome on any actions. Since the Forest Service is responsible for the NEPA on these contracts, then that review should be poised in this scoping or carried in a independent notice of intent.

The WYDF rarely recognizes fragmentation and wildlife security: Roads may fragment wildlife habitat,

create barriers to movement, reduce wildlife habitat capability to sustain populations, and increase areas of disturbance.

Insects and disease:

The complete lack of documented evidence of major pine beetle infestation or other disease in the Lodgepole pine or other conifers across the Bighorn NF, area BLM, State Trust, or private lands. The Forest has repeatedly marveled in public statements about the resilience of our conifers as the epidemic ravaged the Region 2 and 4 USDA-FS lands. admitting often its was not active management as was the failed practices in the Black Hills and Colorado.

CBR and author are not immune to the effects of that historic epidemic (figure 3) I worked in sawmills in Chino Valley AZ (1972) and South Fork CO. Hiked the length of the Encampment River Wilderness in the Medicine Bow-Routt NF. Both the San Juan and Medicine Bow-Routt National Forests have those periods in their historic variability. The Bighorn NF (Knight) et al, do not.

CBR strongly recommends the Bighorn NF and Region 2 USDA-FS investigate that unique history and genetics through the Rocky Mountain Research Station. Seed stocks from the Bighorn NF could provide a more drought and insect resistant Lodgepole pine tree that could benefit the revegetation and future products in the region.

7 | Page

Figure Weminuche Wilderness San Juan NF 2016

Special Places

Pole Creek Nordic Area and Powder Pass Ski S5 (closed to Motorized Vehicles Areas) Powder Pass area was recognized in the 2005 Forest Plan to give non-motorized winter recreation a space when the vast majority of land in the district is given over to over snow travel by tracked ORVs.

Exceptions under travel management are not sufficient to protect this community assist. The pole Creek area has been managed in cooperation with the Bighorn NF and the Powder Pass Nordic Club for more than fifty years. The Powder River RD also has the Willow Park Nordic Area at the Willow Park Campground. All three should be in a designated Winter Sports prescription. These areas are important to the communities of Johnson, Washakie, and Big Horn Counties.

Revegetation, thinning, or burning will destroy the integrity of the Nordic trails in Willow Park and Pole Creek. The trees abate the drifting and provide shade over major sections of the constructed trails. The stands of lodgepole give some anchor to the integrity of the Powder Pass unit.

More special places.

The Doyle Creek arm, an IRA, has been recognized, as a special place both in Forest Management and planning for wildlife. In 2023, it is the target of intense management that threatens it a natural integrity. I had the opportunity to watch 80 cow and calf elk mover through what is characterized as impenetrable patch of dog hair Lodgepole. My companion sitting not six feet away could her them but never spotted the train.

8 | Page

The riparian areas of Doyle and Taylor Creek though not tread by a system trail to the boundary provides dispersed campers, campground visitors, hikers, wildlife watchers, and more a walkable 1.3 miles to the boundary an easy walkable primate recreation experience. The motorized folks have an array of converted logging roads to the north.

Poison Creek arm is another though more developed. My last visit in 2019, creek area was recovering its willow cover and still showed remnants of historic beaver activity.

Every riparian area in those boundary areas that have their watershed integrity maintained and to keep our snow cover retained as long as possible as our winters are drier and warm springs wetter and

longer.

Figure 3 Doyle Creek 2021 Bighorn NF Wildlife.

All wildlife, not just the trophy wildlife.

Birds: How will bird's nesting, food sources, and habitat cover be altered and jeopardized within this large-scale proposed project? What monitoring and data collection has been done within the proposed 92,000 acres on nesting and migrating bird species, including sensitive, indicator, or emphasis species or species of concern, such as the Northern Goshawk, Long-eared Owl, Red-headed Woodpecker, Clark's Nutcracker, Evening Grosbeak, Red Crossbill, Cassin's Finch, Veery, Spotted and Green-tailed Towhees, Common Yellowthroat, and Olive-sided Flycatcher? The environmental impact study should answer these questions and provide all data known and collected. If there is no data, that should also be disclosed. The analysis should also disclose impacts on all bird species that inhabit and depend on this forest.

9 | Page

Elk and Moose: We are concerned about how the proposed project will ultimately impact elk and moose populations. Per the project plan: Large areas of elk calving habitat exist within portions of the project area, and blocks of relatively remote, dense forest serve as security areas that help to retain elk herds in the national forest into the fall season.

Pollinators are not going to thrive in sanitized landscapes. Aquatic insect populations will not thrive in streams filled with silts and trashed run-off from industrial operations (figure 3)

In the areas outside MA 5.13, where the vegetation is not utterly dominated by Lodgepole pine, many treatments and timber activity would reduce elk security habitat within the project area. The wildlife in the 2005 Forest Plan emphasized maintaining elk security acres following harvest. This is provided for in the 2015 Travel guidance. Where are the full closures addressed in this scoping?

Instead, we get more roads, minimal closures, and higher custodial costs while further fragmenting the landscape.

System Roads, Temporary and Other.

As outlined in the 2005 BNF Forest Plan, this area of the Forest is the most heavily roaded geographic area. The Clear/Crazy Travel Management EA showed there was 2.5 miles of road per square mile in this area. Approximately 90% of the area was within one mile of a road. The few roads to be closed in the decision only reduced the density to 2.25 miles per square mile. The road closure goal of the LRMP would appear to support more closures in this analysis. The LRMP discourages new permanent roads such as the Level 1 road proposed near Doyle Creek Campground.

In July 2015 the BNF completed a Travel Analysis Report (TAR) reviewing every road on the Forest. The key results and findings provided by the Interdisciplinary Team (IDT) ranked routes based on their risks to natural, social, economic, and cultural resources and their benefits to recreation use, stakeholder access, timber management access, and emergency access. Each road was then further evaluated to determine if it was needed as part of the minimum road system. Finally, opportunities for changes to roads were identified. A summary of these findings follows:

- o 175 miles of roads in the current system have a greater risk than benefit and should be considered for decommissioning, closure, or mitigated to reduce resource risk.
- o 726 miles of roads in the current system have high to medium benefits and should be considered for regular maintenance to mitigate and prevent resource risk.
- o 153 miles of system roads are recommended to be decommissioned and removed from the system or converted to motorized trails.

The Summary of Issues on Page 1 states, "Insufficient resources for maintenance of existing system of roads." Page 22 and 23 of this report show there is possibility to reduce Maintenance Level (ML) 1 and 2 roads on the Powder River District. ML 2 roads show a potential reduction of nearly 27 miles and ML 1 a potential reduction of nearly 45 miles. The TAR report shows Road Maintenance Budget on Page 37.

10 | Page

The Forest appropriated budget allocation for road maintenance and management of roads was \$558,000 in fiscal year (FY) 2013, \$590,00 in FY2014, and projected to be \$519,000 in FY2015. In prior years, appropriated road funding was supplemented by road construction and maintenance work performed by timber purchasers through the commercial timber sale program. This program has steadily declined over the past 20 years thus increasing demands on appropriated dollars for road maintenance. The maintenance costs shown on Page 39 show a spread of over \$800,000 per the Engineers' and the INFRA estimate of \$2,600,000. The proposed addition of the ML 1 road near Doyle Creek Campground and the ML2 road off of Pole Creek are in direct conflict with the 2015 TAR report. Has the IDT reviewed Table 12 on pages 52 - 56 detailing the specific recommendations for the Powder River Ranger District? Does the BNF receive enough funding to meet the 2005 Forest Plan's goal of maintaining roads to standard in light of the statement under Summary of Issues? Will the Pole Creek Vegetation project implement recommended closures within the project area?

In summary, the Council for the Bighorn Range posits questions:

- * With sales from the 1990s to now, is timber harvesting sustainable while meeting the other goals and objectives of the 2005 Forest Plan? (Page 2)
- * Are the maps available for review of the timber, WUI contracts, and regeneration (Page 2)
- * How will Pole Creek comply with a sustainable harvest? (Page 2)
- * Will the EA take reflect the Management Areas designated in the 2005 Forest? No page.
- * Does the BNF have a current inventory of the old growth for this project? (Page 2)
- * Is there any documented evidence of mountain pine epidemics in lodgepole pine in the BNF? (Page 3)
- * Will the Bighorn National Forest take leadership in the region to seek good science on pine bark beetle and its experience 1980-2010?
- * What percent of the total NFS timber supply will be provided by this vegetation project? (Page 3) What percentage will be managed under Good Neighbor Authority?
- * What would the value of those funds be in 120 years at the inflation rate versus the return from the timber produced? (Page 3)
- * What will the cost per acre be for the Pole Creek project? (Page 4)
- * Is there USFS research supporting the survivable space allegation? (Page 4)
- * Who wants to camp in a timber sale or the resulting opening due to the blowdown? (Page 5)
- * Has the IDT reviewed Table 12 on pages 52 - 56 detailing the specific recommendations for the Powder River Ranger District? (Page 6)
- * Does the BNF receive enough funding to meet the 2005 Forest Plan's goal of maintaining roads to standard in light of the statement under Summary of Issues? (Page 6)
- * Will the Pole Creek Vegetation project implement recommended closures within the project area? (Page 6)
- * How will the aspen treatments be implemented in the 4.2 to maintain the scenic integrity along US 16? (Page 6)

11 | Page

- * Has the IDT reviewed Table 12 on pages 52 - 56 detailing the specific recommendations for the Powder River Ranger District?
- * Does the BNF receive enough funding to meet the 2005 Forest Plan's goal of maintaining roads

to standard in light of the statement under Summary of Issues? Will the Pole Creek Vegetation project implement recommended closures within the project area?

* Will the Wyoming Game and Fish (WYGF) representatives in the EA's ID team stand for the non-game wildlife, the summer nesting birds, in the project area? Will the WYGF restrict furbearer taking in the Beaver analog areas?

The Council for the Bighorn Range will follow up through the year on this project.

Thank You,

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