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First name: Charlotte

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Organization: Powder Pass Nordic Club

Title: Secretary

Comments: Dear Mr. Thad Berrett:

Thank you for the opportunity to comment on the Pole Creek Vegetation Management Project #61834. I am submitting the following comments and attachments on behalf of Powder Pass Nordic Club. Please see attached PDFs for properly formatted comments, maps, and cost share agreement.

Sincerely,

Charlotte Darling

Secretary

Powder Pass Nordic Club

Our Concern: The Pole Creek Vegetation Management Project is poorly-designed, heavy-impact, will destroy hundreds of thousands of dollars of investment and labor, and remove a valuable and unique socioeconomic resource from Johnson County. By not consulting the ski club in the process of developing this proposal, the Forest Service showed disregard for the work and expertise of a longtime partner. We are further concerned that the proposed treatments in this project, within and outside the ski areas, are not all compatible with the most recent Bighorn National Forest Management Plan.

Our ask: That the Pole Creek Nordic Area, and the Powder Pass 449 non-motorized recreation zone, as well as a substantial buffer be set aside from any impacts of this project, as regards both timber treatments and new road construction.

Our analysis and questions (References can be provided upon request):

The proposed treatments would destroy the Pole Creek Nordic Area. The area is vulnerable to high winds and already, exposed portions of the trail system lose snow cover on windy days. Without robust tree cover, the area will not hold snow in sufficient depth and uniform distribution to allow trail grooming or reliable use. The area would no longer be usable as one of the only low-cost winter recreation sites in Johnson County, and one of only two areas maintained and suitable for skate skiing in the Bighorn Mountains. In addition, what snow does remain will be exposed to the sun and its quality for skiing will quickly deteriorate. The proposed clear cut areas for this project fall directly on top of the trail system, with no apparent thought for its existence (see attached maps, data layers sourced from the U.S. Forest Service.) Given the long time duration of this project (15-20 years) and the slow regrowth rate for lodgepole pine (It will take 50 years to grow a tree large enough to reliably catch snow), full generations will miss the experience of skiing at Pole Creek if the proposed treatment within the Nordic Area or its associated buffer boundary occur. This is why we will be asking the Forest Service to remove any impacts to the Pole Creek Nordic Area from the project proposal.

Can the Forest Service provide any evidence, scientific or economic, of harm that would occur to stated project objectives by removing the requested areas and buffers from the project scope? Can evidence of the benefits stated in the project proposal be similarly provided?

Clear-cutting the area would destroy significant community economic investments. In just the past 10 years, roughly \$150,000 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, calculated using the day-rate for labor established in the Forest Service cost-share agreement with Powder Pass Nordic Club (PPNC).

Will the Forest Service account for these potential losses in developing the final project? Can the Forest Service provide information on whether they were taken into account in developing the proposal?

Pole Creek holds significant socioeconomic value for Johnson County. We are highly concerned about this point as Forest Service representatives at a January 26 public meeting held on the project at the Buffalo Fire Hall that no socioeconomic studies have been undertaken, nor are planned, for this proposed project.

On any given day, the lot fills with cars from neighboring counties and states (some noting that the maintenance, grooming, and packing at Pole Creek - all volunteer-provided by Powder Pass Nordic Club (PPNC) - are superior to otherwise similar locations in their home counties.) Tourism is now the second-largest industry in Wyoming, and will be increasingly important for Johnson County's own economy in coming years. Many of these out of town visitors must pass through Buffalo to get to Pole Creek, likely stopping for gas, food, rental ski gear, and other shopping opportunities or events.

All ages and many families use Pole Creek. Apart from personal equipment and transportation costs, use of the area is free. This provides users an important and unique opportunity for outdoor recreation, with its associated physical and mental health benefits. This makes the area economically accessible, and its beginner-level trails make it accessible to all levels of skiers. PPNC has provided free clinics for beginner skiers regularly, giving those interested an opportunity to learn the sport.

Families regularly gather at the Pole Creek trails and sledding hill, and popular events like the Pole Creek Challenge offer opportunities for both community building and tourism.

The non-funded cost-share agreement between PPNC and the Forest Service states, "To provide recreation opportunities and create partnerships are two of the primary management objectives identified in the 2005 Forest Plan." Both of these are achieved through preservation of these recreation activities at Pole Creek. This agreement also states, "it is mutually beneficial and in the interest of both parties to work together in a cooperative relationship to continue to provide this service to the public."

Just weeks ago, the USDA announced an initiative to expand recreational economies and help people thrive across rural America. The lack of consideration for recreational activities in this Forest Service proposal would appear to fly in the face of this new initiative, despite the fact that the Forest Service is itself an agency of the USDA.

A list of resources demonstrating the growing importance of recreation opportunities based on recent trends can be found at the bottom of this document, and should be taken into account in any fulsome analysis of the impacts of this project. The absence of consideration for these impacts is highly concerning.

The project proposal frequently cites economics as a rationale for timber sales. Will the Forest Service agree to take a broader, realistic analysis of the full economic impacts of the project? Will the methodology and results behind any economic allegations be made available to the public?

The ski area has been in this location for more than 50 years. Over that time, constant improvements have been made by volunteers. Crews have removed rocks and trimmed and removed fallen trees from trails. Use has

increased over the years, and the site is now recognized on generic and internet-search maps of the area. This site is established and thrives thanks to the consistent commitment of our community.

How were community impacts taken into account in developing the proposal. Is the ski area on the maps that were used to develop these scoping documents?

Pole Creek Nordic Area represents, by acreage, a small fraction of the total area designated for timber production within this project area: Yet, many of the most severe impacts from proposed cuts overlap directly with our community's trails (see attached maps). This indicates a concerning lack of care and attention from the Forest Service in project planning. The small proportion of the project area encompassed in our request suggests that avoiding the Pole Creek area could in no way undermine stated project objectives overall. Further, although the Forest Service has a long-standing formal working agreement with the PPNC, the Club was not consulted or informed during development of this proposal.

How did the Forest Service account for the work of partners and established agreements in developing this proposal? How will these be taken into account in further proposal development and final decisions?

Pole Creek should be designated as a winter sports area: Despite consistent use and a long-standing cost-share agreement for maintenance of the area with the PPNC, the U.S. Forest Service has not formally designated this area as a winter sports area. This is a gross oversight, and leaves the area vulnerable to this and potential future projects. Further, while the Forest Service has hired a winter recreation specialist for the Bighorns, that individual lives in Cody, travels to the area rarely, and has failed to engage with PPNC. Forest Service support in preserving this valuable resource could take a critical step forward with this designation. The well-used 449 Nordic Area to the west of Pole Creek is monitored by PPNC as well, and deserves the same designation.

What do these areas lack that is blocking such a designation? If this is the product of an oversight, will that be rectified? How?

The Forest Service WUI wildfire treatments in this proposal lack scientific backing: There are dwelling structures within the boundaries of the Pole Creek Nordic Area that could be subject to the Forest Service proposal for this project of a 1/2 mile buffer around all structures in the proposal area. This would be detrimental to the trails, but more importantly, this proposed treatment has no scientific backing. A Forest Service representative during the January 26 public meeting on this project referred to the 1/2 mile buffer as a "GIS exercise". Extensive academic research recommends that 100-200 feet is sufficient for defensible space buffers. The proposal is further inconsistent with the recommendations of recent research that takes into account the growing impacts of climate change. The marshes and meadows adjacent to the structures in the area already help achieve those aims. This haphazard recommendation further indicates the lack of care, community engagement, economic, and scientific analysis undertaken by the Forest Service as a part of this proposal.

Can the Forest Service provide any scientific backing for the fire treatments described, and touted, in the proposal?

This project will have year-round impacts: To the extent that haul roads for the project intersect the Pole Creek trails or the Powder Pass 449 non-motorized recreation zone, the public will be unable to fully enjoy those areas. Given the year-round nature of this proposed project, that represents another threat to our recreation opportunities. Much of the timber harvest could occur during the winter months, which would directly impact recreational uses.

How will road design take impacts into consideration?

Statements made in this Forest Service proposal are false or misleading: Scoping documents cite forest health as a motivator, noting negative impacts from mistletoe, for example, which is endemic to lodgepole pine. This indicates a lack of good faith by the Forest Service in presenting this project to the public. The scoping documents also express a desire to create mixed-age forests - yet those cannot be created with the types of clear cuts that have been proposed.

Can the Forest Service provide any scientific backing for the statements about forest health described, and touted, in the proposal?

The area provides important wildlife habitat: Moose are present in the area on a near-daily basis. At the Pole Creek Nordic Area and across the entire proposed project area, many clearcuts are proposed in elk security habitat and popular hunting areas.

Will an analysis of wildlife impacts be undertaken, and will its methodology and sourcing be available to the public?

Scenic objectives are a crucial element of land management plans: We do not currently understand how and if this project will be in compliance with the Forest Service's Scenery Management System, "a tool for integrating the benefits, values, desires, and preferences regarding aesthetics and scenery for all levels of land management planning." This crucial information is not a part of the current scoping documents, leaving stakeholders poorly able to evaluate the impacts. We expect the Forest Service to fulfill its obligations by explaining compliance with the scenic integrity objectives of the area, but are concerned that Forest Service representatives were unable to provide information on the scenic integrity levels, scenic integrity objectives, and scenic classes for the area encompassing the Pole Creek Vegetation Management Project on request.

How is this proposal compatible with the Forest Service's scenic objectives for the area? Has that been analyzed? Will that analysis be available to the public?

Procedural Failings by the Forest Service: The Forest Service has not advertised the public comment period and public meetings well. Their Facebook post announcing the public meeting on January 26 was made at 2pm on January 25. A post announcing a second, make-up meeting after the first one was affected by winter weather was made with similarly short notice. The project's website and comment form were not working for significant portions of the comment period, and were not linked in Facebook postings. The maps available for public review are not detailed or useful. This project is proposed to be analyzed in an Environmental Assessment, however its large scale in both time and acreage suggests that an Environmental Impact Statement is more appropriate, particularly to evaluate cumulative effects from this project combined with the Buffalo Municipal Watershed project. Additionally, the project is based on the Bighorn National Forest Management Plan, which is nearly 20 years old and does not account for increased public lands recreation of all kinds in recent years.

What processes occurred that allowed this level of poor communication to take place, and what steps will be taken to resolve that as this process goes forward?

Conflicts with use plans: The Forest Service should clearly and transparently account for any conflict with the current Bighorn National Forest management plan. As noted on page 19 of the current Forest Management Plan, "The physical setting and scenic beauty of the Bighorn National Forest will continue to draw visitors. Recreation opportunities ranging from primitive to developed will be available. The Forest will continue to attract visitors for a variety of recreational opportunities. There will be a well developed system of motorized and non-motorized trails which address recreational demand as well as protection of wildlife habitat. Both motorized and non-motorized winter and summer recreation opportunities will be present on the Forest."

Will the Forest Service provide a detailed analysis of any conflicts with the current Management Plan? Has this

type of analysis been undertaken, and will the results of that analysis be made available to the public?

***The following references detail trends in recreation use and should be considered in any honest analysis of this project's impact:

Bowker, J.M., English, B.K., & Cordell, H.K. 1999. Projections of outdoor recreation participation to 2050. *Outdoor recreation in American life: A national assessment of demand and supply trends*. Champaign, IL: Sagamore Publishing: 323-351.

Cordell, H. Ken. 2008. The latest trends in nature-based outdoor recreation. *Forest History Today*. Spring 2008.

Headwaters Economics. 2021. Inspiring the future outdoor recreation economy.

Outdoor Foundation. 2019. 2019 Outdoor Participation Report. Boulder, CO. www.outdoorfoundation.org

Outdoor Recreation Roundtable [ORR]. 2022. Outdoor recreation drives the American economy. <https://recreationroundtable.org/economic-impact/>

Rice, W.L., Taff, B.D., Lawhon, B., & Newman, P. 2021. The new COVID-drive outdoor recreationists in the U.S.: Who they are, who they aren't, and who will stay involved. <https://doi.org/10.31235/osf.io/3khfd>

Streater, Scott. 2022. Outdoor recreation industry revenues spike after Covid plunge. *Greenwire*. <https://subscriber.politicopro.com/article/eenews/2022/11/09/outdoor-recreation-industry-revenues-spike-after-covid-plunge-00065972>

Thank you for your time and attention. If you have any questions regarding the items discussed above, please contact Powder Pass Nordic Club.