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Organization:
Title:
Comments: Thad Berrett, District Ranger

Powder River Ranger District

Bighorn National Forest

1415 Fort Street

Buffalo, WY 82834

February 21,2023

Dear Mr. Berrett:

Thank you for the opportunity to provide input on the Pole Creek Vegetation Management Project. Please see my attached letter.

Thank you,

Jennifer Walker

Dear Mr. Berrett: Thank you for the opportunity to provide input on the Pole Creek Vegetation Management Project. I reside in Buffalo and enjoy year-round recreation in the Bighorns. I appreciate and support the purpose and need for this project and have a few concerns, questions, and ideas.

Regarding current habitat structural stages of the lodgepole forests, I agree there is a need to create more structural diversity in the project area. The scoping document points out there is a scarcity of young stands, so the proposed actions include about 9,000 acres of commercial harvests which would create early seral forests. From the scoping maps, it looks like a high percentage of the proposed commercial work is concentrated in the Pole Creek, Caribou Creek, and Merle Creek areas. Based on the 250-acre size of the Sheep Mountain wildfire of 1994, the size of the proposed clearcuts seems appropriate, however, the concentration and contiguous locations of proposed commercial units is concerning:

[bull] It seems that the area from Pole Creek to Merle Creek will become overly represented by young seral forest stands for the next several decades. What is the desired composition of habitat structural stages, and is there a quantitative objective? Do desired conditions vary for different portions of the project area? How do recently completed commercial cuts in and adjacent to the project area measure into the desired structure?

[bull] Non-treated areas are equally important for structural diversity, including late seral, but many of them would be small or narrow and potentially exposed to windthrow after adjacent cuts are complete. In addition, commercially thinned areas could be highly susceptible to wind throw. Has wind been considered in the design and placement of commercial thinning and leave areas?

[bull] The timeline for implementation ranges from 10 to 15 years I think, which averages about 600 to 900 acres of commercial treatments per year. From an ecological perspective, that seems okay for lodgepole pine stands on the scale of this project area. However, if the treatments are focused in one or two drainages, I believe impacts to other resources must be considered, such as recreation, wildlife, and grazing management.

I enjoy skiing throughout the project area, but the Pole Creek Nordic area and the 449 area are especially important and popular. The maintenance of the trails at Pole Creek is always excellent and creates accessibility for skiers of all abilities; while the 449 area provides opportunity for solitude. Forest management objectives must include maintaining or enhancing these ski areas. Commercial harvest treatments are proposed within both ski areas, including somewhat large clearcuts. The design and cutting prescriptions must be changed in these ski areas to focus on maintaining and enhancing snow cover on the ski trails. For example, patch size of commercial treatments could be reduced to small patches to minimize or eliminate impacts to trails while still meeting forest structure and health objectives. Current and future regen in the areas could be lightly thinned to retain bushy crowns into maturity, which would maintain future shade and wind cover for decades. I understand that tailoring treatments in the ski areas would require more effort and cost, so excluding the areas from treatment should be the only other alternative. Bark beetles, stand decadence, and other potential disturbances would have to be addressed on a case-by-case basis.

I enjoy recreating year-round in the project area because it is convenient for day trips. I typically seek solitude which has become more difficult to obtain in the Bighorns given their increasing popularity. There is an abundance of trails which are open to motorized use, but far fewer trails are managed for non-motorized use. I appreciate and support the proposed road closures. Even though the total closures are minimal, and aim to address elk security cover or improve administrative access, the closures help to diversify recreational opportunities.

I strongly agree that aspen, willow, and riparian areas are important wildlife habitat and I support conifer removal treatments to maintain those areas. These habitats are also highly favored by livestock. I understand that slash and other barriers will be used to protect aspen regeneration, but what will be done to manage livestock in willow and riparian areas so that wildlife will benefit?

Regarding new fences, has wildlife movement been considered, particularly for calves and fawns, and will the construction be wildlife-friendly?

Regarding heavy contiguous fuel conditions, I strongly support the use of broadcast prescribed fire where possible. Fire exclusion and historic timber slash in the Bighorns have created fuel conditions which are difficult to treat mechanically. Prescribed fire would not only treat fuels, but would encourage plant species diversity in the forest understory. In the lodgepole and aspen stands of the project area, I encourage the use of high intensity fire to create stand replacement patches.

Weed management was not addressed in the scoping document but I assume monitoring and treatments will be implemented as needed.

Sustainable forests and forest products are necessary, not only for human use but to maintain businesses and markets which in turn must be used to accomplish forest management goals. This project is proposing commercial treatments of relatively large acreages in a relatively short timeline, so I encourage extending the implementation timeline in hopes of supporting further development and sustainability of local businesses.

All other proposed actions and associated activities seem important and helpful, such as improving degraded functioning stream road crossings, and providing log staging areas.