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Re: Pole Creek Vegetation Management Project

Submitted electronically to: comments-bighorn@usda.gov

Thank you for the opportunity to submit these preliminary scoping comments on the Pole Creek Vegetation Management Project on behalf of the Wyoming Wilderness Association.

An Environmental Analysis is Needed

First, we believe the scale of the proposed project and the community interest in project impacts warrants analysis through an environmental analysis at a minimum. The proposed project should not be considered an eligible candidate for a categorical exclusion. We look forward to additional comment opportunities on a draft environmental analysis, but will briefly highlight some comments, concerns and questions below.

Purpose and Need and More Information Needed

In general, we appreciate the transparent and detailed site-specific information provided in the scoping document. This location-specific information, rather than a "landscape-level programmatic approach" is essential for meaningful public comment and assessment of impacts. Thank you for this.

More information is needed to demonstrate how the project will meet the stated purpose and need. Significant elaboration and evidence is needed to support each of the broad, debatable claims for each of the project Needs listed on page 2 of the scoping notice, and how exactly the proposed action will meet each.

More information on how the project meets or impacts desired conditions in the 2005 Land Management Plan (LMP, or Forest Plan) would be especially helpful. For example, showing management area prescriptions or wildlife emphasis areas on the proposed treatment map would be valuable for public comment and understanding. A thorough analysis of how the proposed action will impact threatened or sensitive species or Management Indicator Species is also needed. How will the alternatives or proposed action impact desired conditions for watershed health, recreation, or roads and trails identified in the LMP?

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Roads and Desired Forest Conditions

Generally, we are in support of proposed road closures and rehabilitation in the scoping notice, and opposed to additional permanent roads in the project area. Proposed road closures should not be considered equal mitigation to offset proposed new roads, when closed roads continue to cause resource impacts and unauthorized use even after official closures. Land managers should consider the project as an opportunity to meet road closure goals in the LMP or travel plan decisions, and the proposed action should disclose how it meets those relative goals and objectives. For example:

- Goal 1 - Strategies 6. Maintain or increase the amount of elk (MIS) security areas at the forestwide scale. Assess availability of security areas at the geographic area scale, and incorporate security analysis in travel and vegetation project management decisions to

increase availability, where feasible.

- Goal 2 - Objective 2.c: Strategies Short Duration Roads 1. When constructing new roads for projects, minimize the creation of permanent roads by using short duration roads where public need does not warrant permanent roads.

- Goal 4 Objective 4.a: 11. Identify and decommission 4 miles of system or non-system road, annually. (LMP pp. 1-11).

The 2005 BNF Forest Plan (LMP) indicates the project area occurs in one of the most heavily-roaded geographic areas of the Forest. The Clear/Crazy Travel Management EA showed there was 2.5 miles of road per square mile in this area and 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 goals in the LMP would appear to support more closures in this area and discourage new permanent roads like the Level 1 road proposed near Doyle Creek Campground.

Inventoried Roadless Areas and WUI treatments

It appears that almost 33,000 acres of the project area are within inventoried roadless areas. Page 5 of the scoping notice states "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 as well as aspen and riparian area restoration treatments that involve tree cutting are planned within these roadless areas. The tree cutting associated with these actions would 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, Part 294, Subpart B). No timber harvest, road construction or reconstruction is proposed within any inventoried roadless areas."

We appreciate your attention to the importance of our remaining, intact, inventoried roadless areas in your analysis as well as the proposed action, and would like to emphasize the

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importance of the latter half of this paragraph. Please elaborate and provide additional information on the following assertion that "A preliminary evaluation of the effects of project activities on roadless area characteristics has indicated that the activities will either maintain or improve roadless characteristics in the long term".

Related to our general concerns regarding impacts of new and existing temporary and permanent roads in the project area, we have significant concerns about proposed temporary logging roads like those that dead end at the IRA boundary near Hazelton Pyramid. These deadend routes are known to lead to continued unauthorized routes which could impact wilderness characteristics and availability of IRAs. Please describe the duration of temporary roads, and the monitoring and implementation plan for effectively closing these roads. Please minimize temporary roads that would encourage motorized incursions into inventoried roadless areas.

In relation to WUI treatments, more information is needed to understand the broad WUI boundaries denoted in the project area and how the WUI was identified. The Doyle Creek Inventoried Roadless Area is of special significance with outstanding wildlife values, and it is unclear how the expansive WUI boundary in this area was determined. Please provide additional information regarding the WUI determination and an alternative that limits or eliminates WUI treatment in IRAs.

Recreation Impacts and Desired Conditions

It appears there is significant community concern regarding the proposed treatment impacts on the highly valued Pole Creek nordic ski area. The land managers should give careful attention and consideration to these concerns and consider how treatments in recreation areas like the Doyle Creek Campground or the ski area meet relevant goals and objectives in the LMP. For example,

- Goal 2 - Objective 2.a: Improve the capability of the Bighorn National Forest to provide

diverse , high -quality outdoor recreation opportunities . (Page 1-5)

- Goal 2 - Objective 2.c: Strategies Tourism and Recreation 1. Coordinate with local government entities on tourism or recreation opportunities. (Page 1-9)

Thank you again for the opportunity to submit these brief comments and establish our eligibility for future comment opportunities. We look forward to an Environmental Analysis with a robust analysis of proposed impacts and a broad range of alternatives. The range of alternatives should include a 'no action' as well as a conservative alternative that proposes the minimum treatment required to meet project objectives, especially one that limits proposed treatments in IRAs, wildlife emphasis areas, and popular recreation areas.

Respectfully,

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