

Comment on the Pole Creek Vegetation Management Project

Cross country skiing is my absolute favorite outdoor activity, and two of my favorite places to ski are the Pole Creek Nordic Area and the 449 Nordic Area. One of the best things about living in Buffalo is its easy access to the Bighorn National Forest, with its excellent recreation opportunities, and the Pole Creek Nordic Area, so close to Buffalo, is one of the best places to cross country ski in the Bighorns. It is peaceful and lovely to ski through the forest, an escape from the stress and pressure of daily life, and I'm up there skiing every weekend (and sometimes after work) as soon as there's enough cover in late fall until springtime when the snow gets sticky. I frequently see moose there and have also seen mountain lion tracks (as well as many other animal tracks), and I love this wildlife viewing opportunity. It can get windy up there, and the first part of the trail after leaving the parking area is a challenge, to ski it as quickly as possible to get into the trees and be protected from the wind. The snow can get thin on this first part as the wind blows it away, but once in the trees, the snow gets deeper. Trees are needed to retain this snow cover and prevent the wind from blowing it away. The Bighorn National Forest is overrun with motorized recreation, and there are very few opportunities for quiet recreation outside of the wilderness (and almost none in winter since it's difficult to get to the wilderness in winter). Do not take these two non-motorized recreation areas away from us.

"Findings from psychological and physiological studies of people under stress, people recovering in hospitals, *people in recreation settings*, and people in other various settings, prove that natural landscape scenes have restorative and other beneficial properties" (emphasis added) (USDA FS 1995, p. 17). Public lands are America's perfect places to recreate and relieve stress, as reflected in the 2005 Forest Plan, Goal 2 – Objective 2.a: Improve the capability of the Bighorn National Forest to provide diverse, high-quality outdoor recreation opportunities (p. 1-5). Pole Creek Nordic Area is the perfect place to "provide [these] diverse, high-quality outdoor recreation opportunities." Clear cutting this recreation area is in direct conflict with Goal 2 in your 2005 Forest Plan.

Furthermore, the 2019 (I'm not sure if this is the most recent map, but it was the one on the counter in your Buffalo office; no one was in the lobby area or came out when I walked in on 2/15/2023) USFS Bighorn National Forest map includes a cross country skier symbol on the Pole Creek Nordic Area and designates the area as S5 (motorized vehicles prohibited in winter), clearly indicating that this area is a cross country ski area, yet this project is proposing to ruin it. One of the purposes of an interdisciplinary NEPA team is to discuss the different resources and work together, but it's clear that recreation was not considered when the area for this project was developed. The Bighorn National Forest has hired a winter recreation specialist, yet that person lives in Cody, rarely comes to the Bighorns, and has not worked at all with the Powder Pass Nordic Club. Is this person a part of the interdisciplinary team? What is this employee's input on this project? What is the point of this person's job if they are failing to even spend time in the Bighorn National Forest?

"Economists recognize that tourism is becoming the leading industry in many regions in the United States and in many foreign countries. In numerous communities adjacent to national forests, tourism and recreation are replacing the former leading roles of timber harvesting, mining, ranching, and farming. Scenic landscapes and recreational settings help to determine the success of recreation and tourism" (USDA FS 1995, p. 18). And this is a quote from 1995! Multiple recent studies highlight the importance of recreation to national, state, and local economies (See Headwaters Economics 2021; ORR 2022; Streater 2022; USDC BEA 2022), and many other studies show that recreation use trends are

continuing to increase every year (Cordell 2008; Outdoor Foundation 2019; Rice et al. 2021). Cross country skiing, in particular, is expected to increase by 95% by 2050 with the biggest regional increase in the Rocky Mountain region (by 144%) (Bowker et al. 1999).

Outdoor recreation is an important contributor to the American economy, and that is true locally in Wyoming as well. Recreation contributes to local economies (restaurants, businesses, etc.) and brings tourists to Buffalo from around the state and beyond (SOBAN 2021), and investing in recreation is a win for all. In Wyoming, outdoor recreation added 3.6% of the State's GDP (BEA 2022). Even more importantly, outdoor recreation generated \$862 billion dollars in 2021 (1.9% of GDP), contributing more to the U.S. economy than oil and gas extraction, mining, and agriculture (timber is not even listed) (ORR 2022; PR Newswire 2022). The Bureau of Economic analysis published data showing how important outdoor recreation is to the American economy, and Jessica Turner, President of the Outdoor Recreation Roundtable, summarized it well when she said, "The BEA data underscores how important it is to invest in public lands, waters and recreation infrastructure from coast to coast and for recreation activities of all types" (PR Newswire 2022). Recreation is the future of our public lands!

This data illustrates the importance of outdoor recreation, including cross country skiing, to Buffalo. Consider our local restaurants and businesses. Think about Sports Lure alone! Three times over the last month, I have gone in there on a Saturday with friends to rent cross country ski gear, and each time, there was a line of people renting cross country ski gear. Every time I go to Pole Creek, I see vehicles from outside of Johnson County. This Nordic Area clearly benefits Buffalo and should be maintained.

I urge you to study how this vegetation management project, and specifically the treatments in Pole Creek Nordic Area, will affect Buffalo and its businesses. Follow Goal 2 – Multiple Benefits to People, by "recogniz[ing] the interdependence between the Bighorn National Forest and local communities" (USDA FS 1995, p. 1-5).

"The [Scenery Management] system is to be used in the context of ecosystem management...and to ensure high-quality scenery for future generations" (USFS 1995, p.5). "Research has shown that high-quality scenery, especially that related to natural-appearing forests, enhances people's lives and benefits society" (USDA FS 1995, p. 17).

The basic premises for the Scenery Management System include that "desires of constituents must be considered...They have expectations, desires, preferences, behaviors, acceptable levels of quality, and values of landscape character and scenic integrity" (USDA FS 1995, p. 32). Clear cuts would create unacceptable views in the Pole Creek Nordic Area; they damage the landscape character and reduce scenic integrity, greatly diminishing the recreation experience. A good portion (half?) of the Pole Creek Nordic Area falls within the viewshed of the Highway 16 Scenic Byway, which includes proposed treatments. It is doubtful that clear cuts would maintain the scenic integrity of the byway.

"People have greater scrutiny of landscape character and scenic integrity when they view landscapes close-up and for longer periods of time" (USDA FS 1995, p. 33). Skiing the Pole Creek Trails allows for close-up views, typically for an hour or more. For much of this trail system through the woods, the forest is the *only* thing to look at. Therefore, its scenic value is hugely important.

Scenic integrity is maintained by "intactness and wholeness of the landscape character" (USDA FS 1995, p. 2-2), and the handbook includes a photo of a "natural-appearing continuous textured landform with

no evident timber harvest, power line, roads, or other human alterations" (p. 2-2). The Pole Creek Nordic Area already has a power line along one of the trails, while the rest of the trails are free of other human alterations. A clear-cut in this area would completely destroy the remaining scenic integrity. Clear cuts also are not compatible with maintaining the surrounding form, line, color, pattern, and texture.

Chapter 2 of the 2005 Forest Plan describes scenery and specifically calls out "cross-country ski areas" (p. 2-43) as part of the scenery, also stating that "the landscape has a predominantly natural appearance" (p. 2-43) and "vegetation management will be used to enhance the scenic resource and is done in a way that blends with the landscape" (p. 2-43). During the public scoping meeting, one of the stated reasons for this project was to prevent beetle kill should beetles arrive in the Bighorns. The Forest Plan, under Standards and Guidelines, Insects and Disease, also states "focus management activities and methods on enhancing or protecting scenic quality of the area" (p. 2-43). Under Scenery Guidelines, it states "...manage for a scenic integrity objective of moderate." (p. 2-44). In chapter 1 under Scenery Management Guidelines, it says "4. Plan, design, and locate vegetative manipulation in a scale that retains that color and texture of the landscape character, borrowing directional emphasis of form and line from natural features" (p. 1-57); on the same page, Guideline 7 says "Within the seen area of scenic byways and developed recreation sites, maintain quality scenery and recreation experience while managing forest vegetation to provide vegetative diversity. The highest priorities for protection of scenic quality are scenic byways and developed recreation sites" (p. 1-75). The Pole Cree Nordic Area is one such developed site, and the Highway 16 Scenic Byway passes right by it. Clear cuts absolutely DO NOT blend with the landscape, do not retain the color and texture of the landscape, and are not moderate changes; clear cuts should not even be considered in the Pole Creek Nordic Area. Please follow your own descriptions, guidelines, and objectives and remove the Pole Creek Nordic Area from this vegetation management project.

Another benefit of the Pole Creek Nordic Area is the partnership with the Powder Pass Nordic Club, and the importance of partnerships is highlighted in Strategy #8 under Goal 2: "Encourage, establish, and sustain a diverse range of recreational facilities and services on NFS lands. Partnerships are one mechanism of accomplishing this."

Members of the Powder Pass Nordic Club have contributed countless hours to maintaining, improving, and grooming the trails. The club hosts the Pole Creek Challenge, a fantastic community event that I have seen grow in popularity immensely over the last few years. Over the last decade, financial contributions from the Johnson County Recreation District, JCTA, and private donations have totaled approximately \$150,000, which has been put toward equipment and improvements to the trails, and over 4,000 hours of work have been contributed by volunteers. Clear cutting this area would negate all of that! What a sad waste that would be.

The size and duration of this project is also concerning and warrants an Environmental Impact Statement. A project that consists of 92,000 acres with 37,000 of those acres classified as suitable for timber production will not have a Finding of No Significant Impacts. For a project that lasts 15-20 years, an Environmental Analysis is insufficient to clearly state the details of the project and its impacts.

For those of us who ski or snowshoe at the Pole Creek Nordic Area, we feel a strong sense of place and attachment to it. Earlier this winter, I was skiing with a friend at Cutler Nordic Trails (along Highway 14), and we spoke to another skier who talked about how Pole Creek was "dog central," yet he didn't say

anything about how there was dog poop everywhere at Cutler. I felt slightly defensive and very proud that even though there are a lot of dogs at Pole Creek (and at Cutler as well), the users at Pole Creek clean up after their dogs and keep it looking nice for all visitors. Aaron Kessler (and others) grooms the trails at Pole Creek weekly, and does a far superior job to the groomers at Cutler and Sibley Lake. We skiers and snowshoers love our little Nordic area at Pole Creek. Pole Creek is a tiny fraction of the 90,000-acre project area, and so is the 449 Nordic area. Please remove both areas from this project. Do not implement clear cuts that would surely ruin the winter recreation opportunities there. Recreation, NOT timber, is the future of our national forests.

Thank you for your consideration,

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