

**Thad Berrett, District Ranger
Powder River Ranger District
Bighorn National Forest
1415 Fort Street
Buffalo, WY 82834**

**February 20, 2023
RE: Pole Creek Vegetation Management Project**

Dear Mr. Berrett:

I have a number of comments regarding the proposed Pole Creek Vegetation Management Project. Please see below.

Why is the proposed project being analyzed in an Environmental Assessment rather than an Environmental Impact Statement? Based on the very large scale of the project, at over 92,000 acres, with treatments planned on more than 25,000 acres, it is hard to believe that the project would not have significant impacts. Environmental Assessments are required to be site-specific, and this project does not seem to fit that description. There are a wide variety of areas, resources, and habitats being impacted. The time scale of the project is 15-20 years, with impacts reaching well over 50 years. When these treatments are implemented, the staff analyzing the project will be nearing retirement. This disenfranchises young forest users and forest users of the future who do not have the opportunity to comment but will see and feel the impacts of these decisions. An Environmental Assessment is not sufficient to address the massive size and time scale of the proposed project.

A smaller-scale, phased implementation approach with more specific information on when and where treatments would occur would be much more understandable for the public, and allow treatment effectiveness to be assessed before further treatments are implemented. It only takes a few days to clearcut many acres, but it takes them decades to recover: we need to see what that looks like before we lose an entire forest in the name of fire and disease prevention.

Giving the public a 60-day comment period to address impacts to 92,000 acres of wildlife habitat, recreation resources, visual resources, aquatic resources, road changes, forestry and fuels projects, etc. is not sufficient. Local government representatives and interest groups should be consulted in the development of this project. It is clear that the Forest Service did not involve local governments or even consult their own resource specialists and maps while designing the project. The project affects very high-use areas and most of the public were not aware of the project until the last few weeks of the comment period due to poor advertising and publicity of the proposed project. While the Comment Period opened on December 22, 2022, the first mention of the project on Bighorn National Forest's own Facebook page came on January 25, 2023 at 1:43 PM, announcing a public meeting regarding the project to be held the following evening, January 26. That was 34 days– more than halfway through– the public comment period. That is very poor public outreach for the NEPA process, which is meant to be participatory.

Many of the actions proposed by this project are based on mapping and decisions made in the 2005 Bighorn National Forest Plan. This plan is nearly 20 years old and in need of revision and should not be overly relied upon to design projects in 2023. For context, the plan was written two years before smartphones were widely available or in use, ten plus years before GPS land ownership chips and e-bikes were popular. Outdoor recreation and the use of public lands has changed drastically in the past 18 years, and even more substantially in the past 3. The COVID-19 pandemic has engaged millions more individuals with the outdoors, and outdoor recreation and tourism have become significant economic sectors. The Bighorns are no exception– the increased recreation use and changes to the ways in which the forest is used, along with updated scientific research on the impacts of climate change need to be recognized and considered in developing any projects on the forest, particularly those with wide-reaching, very long-term impacts.

The provided maps suggest clearcutting timber adjacent to meadows in many areas. Removing this hiding cover and security habitat for wildlife will have significant effects on big game populations in the area, and increase stress on elk herds during calving and hunting seasons. Turning areas into essentially huge meadows will also have substantial impacts on wind action across the landscape and snow cover, affecting the hydrology of the area. Will all of these trees be removed at once in close succession? Again, the scale and lack of specifics in this project are very concerning. Without information on how the project will actually be implemented (all in one year? Over ten years? When??), the Environmental Analysis and public comments can not truly address the potential impacts.

The treatments that are proposed do not seem well-researched, including clearcutting essentially the entire Pole Creek Nordic Area. Pole Creek Nordic Area has been used for decades by hundreds of people each week for recreation in the winter, to provide mental and physical health benefits, commune with friends and family, and as a way to enjoy our public lands. The clearcuts, extensive WUI buffers, and other treatments in this area would destroy the integrity of this recreation area by severely impacting its ability to hold snow, and maintain the quality of snow needed for grooming cross-country ski and snowshoe trails. Lodgepole pine takes 50+ years to grow to a size capable of capturing snow. If these areas are clearcut, today's high school students would be eligible for Social Security by the time the ski trail resource is restored. I would be in my mid-80s– while I hope to still be skiing and hiking every weekend in 2073, it's hard to say what life will look like then.

The fact that the most concentrated timber treatments in the entire project area overlay this area makes it seem like the Forest Service has completely disregarded this well-established, incredibly valuable resource, and perhaps not even consulted their own maps. Not only have hundreds of thousands of dollars in materials and labor been donated to maintain this area– by the unpaid, volunteering public, not the Forest Service– this area represents the only Nordic ski area in Johnson County, and the only area groomed for skate skiing on the southern half of the forest. The Pole Creek Nordic Area represents about 1,000 acres of the project area. Would the Forest Service rather reduce their timber treatments by 5-6% or destroy 100% of the nordic skiing opportunities in Johnson County? The Pole Creek Nordic Area should be removed from the proposed project area, and given a sufficient buffer to ensure that adjacent treatments and road developments do not impact the integrity of the ski trails. The Powder Pass 449 area should also be removed from the proposed project area, with careful attention given to Trail #127 and others adjacent to 449 that allow loop routes from Sheep Mountain Road into the non-motorized area. If

not removed from the project entirely, these trails and roads should be sufficiently buffered from clearcuts and other timber treatments to ensure that they hold enough snow to be enjoyed as ski trails. These areas adjacent to the 449 area should also be considered for designation as a winter recreation area.

In addition, the Forest Service needs to designate Pole Creek Nordic Area and the Powder Pass 449 area as winter recreation areas, rather than only specific travel management zones. It is an appalling oversight that this was not completed in the last forest plan or in any other avenues since. The area has a substantial, dedicated user base spanning across northeast Wyoming, and multiple states, as evidenced by the recent outpouring of support for Powder Pass Nordic Club, who maintains the ski trails. Does the Bighorn National Forest have any numbers on daily use of this area by recreationists? Perhaps it is time to quantify the importance of the area to the local community and consider making additional investments in it, while also ensuring its protection into the future by designating it as a non-motorized winter recreation area. Including these designations in the NEPA process is not outside the scope of this project proposal which affects wildlife habitat, roads, and multiple recreation resources across 92,000 acres, and should be included in the proposed action.

The proposed WUI treatments are excessive. Buffers of 1700 feet are well beyond what is needed to protect a small cabin, even based on the Forest Service's own research. Why is the Forest Service planning to expend federal funds to protect structures on private surface? The private property owners should be expected to help pay for this work, just as grazing permittees must fund their own range improvements. If it is range improvements (i.e. cow camp cabins) being protected, some of the funding should come from the permit holders. Before deciding that every structure needs a massive WUI buffer, these structures should be assessed for their value on the landscape and whether they would need to be replaced if they were destroyed by wildfire. Again, these specifics should be included in the site-specific project plan analyzed under NEPA. The Forest Service has consistently allowed bridges and other safety infrastructure along hiking trails to disappear without replacement- why should other land uses receive superior treatment, especially if they are private inholdings?

In summary, the Forest Service needs to re-evaluate the scale of this project in both space and time, consider the significant impacts to wildlife habitat, take a hard look at the proposed WUI buffers, and remove the Pole Creek and Powder Pass 449 Nordic Areas from the proposal while also designating them as winter recreation areas. I fully recognize the value and need for multiple use management of these landscapes, and the need for sustainable, pragmatic forest management; but not at the cost of decimating high value recreation resources that could be easily protected.

Thank you for the opportunity to comment.

Sincerely,



Charlotte Darling
Buffalo, WY