

Data Submitted (UTC 11): 1/31/2023 7:00:00 AM
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Organization: Wyoming State Forestry Division
Title: Interim State Forester
Comments: 01/31/2023

RE:PoleCreek Vegetation Management Project

Mr. Rathbone,

On behalf of the Office of State Lands and Investments - Wyoming State Forestry Division we would like to extend our gratitude and thank you for the opportunity to comment on the PoleCreek Vegetation Management Project for the Bighorn National Forest. We are in support of the proposed project and proposed actions contained within "to improve the health and productivity of the forests, grasslands, and watersheds; achieve a more balanced mix of forest habitat diversity, and reduce the risk of uncharacteristic wildfire effects". We agree that the objectives of the project are needed and that the implementation of the proposed actions of commercial timber harvesting, prescribed fire, pre-commercial stand improvement thinning, non-commercial fuel reduction thinning, aspen/riparian habitat restoration, and changes to the permanent road system will help to strengthen the Bighorn National Forest and make the system more resilient to disturbance while offering more ecological diversity across the landscape of the project area.

We are encouraged by the approach of the project and its particularly beneficial promotion of proactive forest management for the benefit of the multiple uses that national forest systems provide, while remaining in line with the objectives already out-lined in the current Bighorn National Forest - Forest Plan (circa 2005). Subsequently, the restorative and diversification objectives of the project will assist in the adaptability of the landscape when faced with unpredictable changes caused by insect and disease outbreaks, weather events, and wildfire severity, while helping to ensure future commercial harvesting return.

We are also appreciative of the thoughtfulness in the project's design in terms of treatments and proposed areas, though we are curious with the use of prescribed fire as no designated areas for this treatment have been identified. We want to ensure that no suitable timber lands would be subjected to the use of prescribed fire unless first evaluated for commercial harvesting options.

We are encouraged that this project also includes proposed wildland urban interface (WUI) projects that will benefit the neighboring private and state lands. The proposed WUI treatments will add value to the fuels mitigation work that has been completed adjacent to the project area, while also creating opportunities to further increase the scale by including additional areas. We are also appreciative that the project officially includes FS road 58311 as an open road to the USFS BHNH road network. This is a critical access road to State, BLM, and

private lands which will assist in future cross-boundary project implementation while also being a wildfire suppression access road.

We would caution on the decommissioning of roads within contained inventoried roadless areas, as this action would remove the ability of the Bighorn National Forest to utilize this access in the future. A preferred alternative would be to close access to the public and leave the road for administrative purposes. However, we are pleased to see that aspen and riparian restoration work is proposed within the roadless areas and that the work will align with the exceptions listed in the federal regulations governing the Protection of Inventoried Roadless Areas (36 CFR Title 36, Part 294, Subpart B).

Wyoming State Forestry Division recommends continuing to utilize the Good Neighbor Authority (GNA) within the Bighorn National Forest. GNA allows for partnership opportunities, with other land ownerships, that can achieve cross-boundary silvicultural treatments to increase the scale and positive impact of proactive forest management through the State contracting process.

We appreciate the Bighorn National Forest's willingness to continue to manage their forest systems for multiple uses for future generations. Restorative efforts in aspen and riparian systems, pre-commercial stand thinning, fuels reductions, and commercial timber harvesting will all work together to provide beneficial outcomes to the diversification of the forest systems of the Bighorn National Forest; creating a better return on future commercial harvesting, hardening the structures of the forest to the effects of wildfire and other disturbance regimes, while supporting the forest products industry.

Sincerely,

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Kelly Norris - Interim State Forester/Assistant State Forester - Operations