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Organization:

Title:

Comments:

~ EB 2. 12023

Diane E. Adams

February 18, 2023

Thad Berrett, District Ranger

1415 Fort Street

Buffalo, WY 82834

Dear Mr. Berrett:

I am writing to comment on the proposed Pole Creek Vegetation Management Project. As a member of the Powder Pass Nordic Club board, I am very concerned about the Impact of the project on winter recreation in the Pole Creek Nordic Area. Our club has had a longtime working relationship with the local Forest Service recreation staff, but it appears that winter recreation was not even considered in the development of the timber harvest plan.

1. The commercial timber harvest areas shown on Project Map 2 Include seven regeneration harvest units and two partial thinning units that overlay ski trails within the Pole Creek Nordic Area. Most of the regeneration harvesting is proposed for the west side of the Nordic area. According to USDA NRCS wind rose data, the prevailing winter winds for our area are primarily from the northwest, and removal of tree cover would severely Impact the snow depth on the ski trails. The increased sun exposure due to the loss of tree cover would also Increase melting and snow loss.

2. The use of heavy equipment within the harvest units will significantly Impact the ski trails. The Nordic club has invested many volunteer hours and substantial funds to maintain the trails. Logging equipment will disturb the trail surface and Increase rock exposure that the club has been trying to remediate. After harvest occurs, the Forest Service's practice of ripping compacted roads to close them will severely Impact the trails.

3. The proposed timber harvesting will have a long-term impact on the ski area. The lodgepole pine that comprises the majority of the tree stands in the area will take up to 80 years to regrow to maturity [Pinus contorta Dougt (usda.gov)]. Seedlings and immature trees that grow up after harvest will not provide the same cover necessary for reliable snow for skiing.

4. Loss of the winter recreation area will have an economic Impact on the city of Buffalo. My husband and I frequently see out-of-state vehicles parked at the Pole Creek area, particularly during the holidays. Those users undoubtedly purchase gas and food on their way through Buffalo, and purchase or rent winter gear at the Sports Lure. Our family has rented x-country ski equipment many times over the years to use at Pole Creek. It is an ideal area for children and novice skiers, due to the groomed trails and easy terrain. I would guess that many of the winter users of the Muddy Guard and Pole Creek cabins are attracted to the area because of the x country skiing.

5. One significant advantage of the existing ski area is the lack of motorized use in the winter. We frequently ski other parts of the national forest, including the areas around Munkers Pass and Forest Road 449. Unfortunately, snowmobilers and ATV users create deep ruts that make it difficult for x-country skiing, and winter logging in the Pole Creek area will likely encourage more motorized use.

If the ranger district is willing to consider some alternatives to the proposed logging within the Nordic area, I would suggest:

1. Reduce the size of the harvest units, to avoid intersecting the existing ski trails.

2. Consider more partial harvesting, like the units proposed for the highway corridor, rather than regeneration harvesting.

3. Allow expansion of the non-motorized Nordic area, possibly to the northwest where there are younger stands of trees. This would require that roads be closed at least seasonally to prevent damage to groomed trails. However, the existing parking area that is plowed by the Wyoming Highway Department limits where any expansion could occur.

It appears that the Forest Service mandate to manage for multiple use has gone by the wayside. In the planning of this vegetation management project, timber harvesting has taken priority over other uses, and impacts to an established, long-term winter recreation use was not even considered.

Sincerely,

Diane E. Adams