

I think the introductory pages are well written and readable. Nicely done.

I really like the resource organization. It flows very well.

Watershed pg 15-17

FW-DC-WTR

04

The timing, variability, and water table elevation in groundwater aquifers are within the natural range of variability. Has this been described and if so, where?

Can this be achieved in stream corridors which have been heavily impacted by historic mining? If not, may need to have a caveat for these or define the NRV as the new condition.

05 This seems very hard to achieve in Tenmile and possibly in McClellan. These are high to moderate severity fire regimes, not surface fire regimes. Low intensity may be more doable than surface fires. It will take a lot of fuel reduction to achieve this which is fine, just need to be aware.

07 Is “natural” achievable in highly altered drainages? May need dc statements for these.

08 Have reference dimensions and ranges been defined and if so, where? If not, is there a plan to define them?

09

Wetland and groundwater dependent ecosystem vegetation communities are [I would like to see “dominated by appropriate native species and” added here]. Again, must be defined or have a plan to get there.

FW-OBJ-WTR

I would like to see an objective of mapping and rating riparian areas across the HLC, beginning with the 34 impaired watersheds, then the functioning at risk.

Comment on this section—it is striking that there is no mention of livestock grazing in relation to riparian/wetland/spring management in guidelines for this section. Some language like “Livestock grazing will occur in such a manner as to be compatible with these desired conditions”. It will take a lot of change in some areas of livestock use to begin to move toward the DC’s and this should be highlighted.

Fish and Aquatic Habitat pg 17-19

DC 01 is well written.

Essential characteristics of this resilience are healthy, functioning aquatic, riparian, upland, and wetland ecosystems [I would like to see added “that function within the NRV”.] Now this assumes the NRV is described...

05

“not degraded to levels that favor “ could be stated more positively as “are maintained in conditions that favor native aquatic species

Goals (FW-GO-FAH)

I would like to see a Goal for westslope cutthroat trout in addition to bull trout

Objectives (FW-OBJ-FAH)

The objective of 2 chronic sediment source repair forestwide seems very low. I would think at least one per GA would be more appropriate and very doable over a five year period.

Guidelines (FW-GDL-FAH)

Guideline 01 the word “should” is not enforceable. There is an adequate caveat that this should be “will”.

03 prevent cattle from loitering in streams. I would change this to “will apply best management practices to insure the grazed areas move toward desired conditions”.

General observation here—the livestock guidelines should apply to all streams not just fishery streams, which it appears may be the case since they are here. May be more appropriate to have them in the WTR section.

Conservation Watershed Network (CWN) pg 19-20

FW-OBJ-CWN

“Repair 2 road/stream crossings every 5 years at locations where chronic sediment sources”

This seems very conservative. I would ask that a minimum of 1 crossing per GA be repaired over a 5 year period. Even this seems conservative.

FW-GDL-CWN

01—this “should” needs to be replaced with “will”. There is an adequate caveat here.

Riparian Management Zones (RMZ) pg 20-22

FW-DC-RMZ I think this should contain some guidance for highly altered riparian areas (thinking mining mostly). Natural anything in these areas will be very difficult to achieve.

FW-OBJ-RMZ

I like the objective here. I think there should also be an objective (mentioned above in WTR) to delineate and identify the condition of the RMZ's. Not sure what an achievable amount would be. 20 -30 miles of stream annually should be doable.

FW-GDL-RMZ

Guideline 4 seems very weak. Maybe “
new road construction in riparian management zones will be avoided, including temporary roads, unless all other options are infeasible.”
Guideline 06 and 09 appear to be overlapping.

Soil and Geology (SOIL) pg 23-25

FW-DC-SOIL

Table 3 Nutrient cycling—what is an alternative if ecological sites are not available. “Expected ranges” relates to NRV or ecological sites I think but uses the term habitat type.

FW-GDL-SOIL

01 I assume this is based on traditional logging equipment. What about chippers, spiders or forwarders that are designed to minimize soil disturbance? It may be handled in the caveat but it seems to be setting up a conflict that may not be necessary.

04—85% is a high number. Ground cover includes litter, wood etc I assume—is this spelled out somewhere? A timeframe to achieve 85% seems important.

Air—no comments. It looks good

Fire and Fuels Management (FIRE) pg 25- 27

FW-DC-FIRE

01—should include all ecosystems or specify forests is inclusive.

FW-OBJ-FIRE

01—these acres seem very conservative and are inconsistent with NRV. A range of 10,000 to 30,000 acres would be better. Unplanned ignition acres should be handled separately from planned ignitions. This guideline should relate to the vegetation NRV.

It would be nice to reward adjacent land managers that are doing fuel treatments by prioritizing these areas for treatment.

FW-STD-FIRE

02—this should be determined by the Forest Supervisor or someone in addition to fire management. And it seems very limiting—suppression should be dependent on resource benefits and fuel conditions not on ignition source. I understand this is national direction. I would encourage the Forest to ask for relief from this direction.

FW-GDL-FIRE

I would like to see a guideline to use managed fire to achieve resource desired conditions and protect adjacent high value resources.

Vegetation pg 27

Well written introduction.

VEGT pg 28

Well written section. Table 4 should be in this section. The PVT's need to have narrative describing them. The names alone are not descriptive enough for people to understand. Fire regimes need to be described in some detail here rather than the glossary. If they stay in the glossary people should be specifically pointed to the glossary.

VEGF pg 29-38

This is a well written introduction. Much of this language currently applies to how nonforested vegetation is classified and mapped currently. Some of this could be moved to the terrestrial vegetation section to cover the nonforested veg section (or repeated as appropriate) which is sparse.

One potential issue is that some portion of the area currently classified as forested (10%+ canopy cover) was very likely a savanna (5-10%) or even a grassland or shrubland (<5% tree cover) in NRV. Many of these lands also supported mountain big sagebrush, as evidenced by the skeletons in the understory when the canopy was less than about 25% canopy cover. Sagebrush is an important species that is decreasing in extent and distribution along with other shrubs and grassland. I think it is important to have a desired condition that reclaims the extent and distribution of these types, savannas, shrublands and grasslands. Some of the land for that will come out of the currently classified forestland and should be addressed if it can't be quantified.

FW-DC-VEGF

I would suggest a desired condition that addresses the understory. This is applicable to the warm dry types so could be included there also. Language such as "Understory plants occur in distribution and density that would have occurred under natural disturbance regimes (or NRV). The understory is resilient in response to disturbance such as fire and resistant to nonnative invasion. "

VEGNF

No reference to NRV here—that seems very important for these types. I would recommend including as a goal establishing/maintaining NRV for grasslands/shrublands/savannas particularly as it relates to “natural” extent.

Soil crusts, cryptogams, lichens and mosses, should be addressed at some level in the goal.

FW-DC-VEGNF

Table 14.

Xeric grassland—halfshrubs and shrubs are an important component (less than 10% cc) in these grasslands. Blue grama is an important grass here.

Mesic grassland—unlikely that blue grama (misspelled in the table) would be present but timber oatgrass (Danthonia) and sedges would be.

Mesic shrubland—should include rough fescue. Bitterbrush should be listed in the shrubs.

Riparian/wetland—should include aspen.

Anaerobic is misspelled

Savannas are minimally addressed. They should be included in the table as by definition they are not included in the warm dry types (5-10% canopy). The glossary doesn't have a lower limit but I would suggest 5% so they can be mapped and managed appropriately.

05 this DC almost addressed the concern expressed under VEGF although I believe it is understated. There has been a loss of the extent of grassland/shrubland/savanna that is significant. I would be sure about an upper limit of 20% before I would put it in this document.

06 This is confusing as I believe it is describing a habitat type accurately, but by definition these types are not represented in the forested section by warm dry potential vegetation types.

FW-OBJ-VEGNF

I think 70,000 acre lower figure is ok (I would like to see the range at 10,000-30,000) but the planned/unplanned ignition objective could be as low as 50,000 it appears.

FW-GDL-VEGNF

These look very good.

PRISK pg 41-42

Good section. No comments.

POLL pg 42-43

Good section. No comments.

INV pg 42-43

“Should” is used in the introduction. I think the word should be will with caveats if necessary.

The following sentence is troubling: “These conditions should be addressed within the bounds of resource constraints with future actions balanced with recognition and attention given to the **relative return on investment**” it is not clear what investment is being evaluated. If the relative return includes biodiversity, native species and native soil biota that is a fair evaluation. If the relative return is strictly about the cost of treatment this is too narrow.

I would really like to see “longterm control treatments are emphasized when feasible” inserted here.

FW-OBJ-INV

I would suggest an objective that includes keeping an up to date accurate map of infestations including densities.

I would like to see areas prioritized when adjacent landowners are undertaking control actions.

Wildlife pg 44-48

FW-DC-WL

02 and 03 reference vegetation—it is important to specify the vegetation components will be provided within the appropriate natural range of variation.

FW-DC-WLRSK

02 need to add as appropriate to the NRV of the vegetation

FW-GDL-WLRSK

Guideline language includes should rather than will.

WLO

No comments on section.

REC pg 49

No comments

ROS pg 50

Does table 15 represent the desired and existing condition—are they the same or are some changes needed to achieve these numbers?

DEVREC pg 50-51

No comments

DISPREC pg 51

I think “that are compatible with other resource desired conditions” should replace “minimal environmental impacts”.

RSUP pg 52

No guidelines for this section. The goal of increasing the diversity of recreation provided by outfitters and guides needs guidelines as to how this will be assessed.

ACCESS pg 52

I would like to see current access as a minimum for the desired condition. Also some way to address keeping public access on those access routes where no documented access exists is very important [I don’t know how to state this].

No goals or guidelines for this section. There should be.

SCENERY pg 53

No comment

WILD and RECWILD and WSA pg 54-58

Are planned ignitions appropriate in these areas? I think they should be.

IRA pg 58-61

FW-DC-IRA

03 Do all the IRAs have high scenic quality? If not, obj should be established.

04 I believe some existing IRAs are not currently semi-primitive . Does the goal of SP mean both motorized and nonmotorized? I don’t think this is clear or particularly meaningful if it isn’t specific. I also don’t believe they all are semi primitive currently but I need to look at the maps.

FW-GDL-IRA

Are planned ignitions compatible with the scenic integrity objective of high.

FW-SUIT-IRA

01 “Inventoried roadless areas are not suitable for timber production but timber harvest may be allowed for other resource benefits consistent with the 2001 Roadless Area Conservation Rule.” The interpretation of the rule is quite confusing. It would be nice to have it in the management actions as an example of how this might be determined.

WSR pg 61-67

No comments

CDNST pg 68

FW-DC-CDNST

I thought parts of the CDNST are motorized?

FW-GDL-CDNST

Most guidelines have the word should in them. I believe this weakens the guideline.

LCNHT pg 71-72

No comments (no knowledge here)

RNA pg 73

02 “Motorized travel, in both summer and winter, is not suitable within research natural areas except on designated routes.” Are you sure?

LCIC pg 74

No comments

CR pg 75

No comments

TRIBAL pg 76

There are no goals or guidelines for this category. A goal here to work with the tribes to identify sacred sites seems important.

LAND pg 77

FW-DC-LAND

01 please add “and resource desired conditions”

02—I would like to see “compatible with other resource desired conditions”.

LAND USE pg 77-78

FW-DC-LAND USE

01 and 02—I would like to see “compatible with other resource desired conditions”.

Roads and Trails pg 78-79

FW-OBJ-RT

01 Maintain 100 to 500 miles of system road annually.

02 Maintain 100 to 500 miles of NFS trails annually.

I would like to see these expressed as percentages of the total as well.

FW-GDL-RT

Should is in the guideline language

FW-GDL-RT

“01 During dust abatement applications on roads, chemicals shall not be applied directly to watercourses, water bodies (e.g., ponds and lakes), nor wetlands. “ This seems inadequate—runoff and movement to waterways is a concern with other chemicals (pesticides).

03—seems that this is a will not, not a should

BRDG and FAC pg 79-80

No comments here

SUS pg 81

FW-DC-SUS

01 doesn't mean much. As compatible with resource dc's would help maybe

GRAZ Pg 82

FW-GDL-GRAZ

01 I think “to meet resource desired conditions” or something.

03 What else would this be based on? I would use less specific language-how about “based on the latest available scientific classification” (or methodology)

Lots of shoulds here. For example, 02 and 05—why would they not be designed for this? Riparian management zones should be cross referenced I think.

I think livestock grazing should have some standards that speak to grazeable lands, compatibility with other resources, etc.

TIM pg 83-86

FW-GO-TIM

03 Please add “and other resource desired conditions”

FW-STD-TIM

02 has the appearance of a contradiction. The first sentence says “only” and the last sentence says this may not happen (which is a good thing). I would recommend that you add a caveat to the first sentence for clarity.

08 I’m surprised to see the 40 acre limit here. Is that prescribed by law/policy? Nice to have the exception spelled out but it is very specific to the moist types. (I don’t have a clear understanding of the harvest methods)

OFP pg 86-87

FW-DC-OFP

01 please add “compatible with other resource desired conditions”

FWL pg 87

FW-DC-FWL

Overall, this should be tied back to vegetation NRV.

SU pg 88

FW-DC-SU

“as compatible with other resource desired conditions”

EMIN pg 89-90

FW-DC-EMIN

Well written.

FW-OBJ-EMIN

Seems very conservative.

CONNECT pg 90-91

Citizen monitoring would be appropriate here (unless that is included in stewardship).

CARB pg 91

Well written

GEOGRAPHIC AREAS

ELKHORNS GA

Pg 118. “This GA is the only one in the plan area where nonforested potential vegetation types are the most common types.” Is this true? It is for the ECMA but I don’t believe it is for NFS lands.

Social and Economic Characteristics

Pg 119. The effect of inholdings and housing development in and around this GA have a major social impact.

Cultural and Historical Characteristics

The fact that much of the northwestern part of this area is second growth timber may be of interest. This is true in other GAs such as Divide.

EH-DC-VEG

The pvt's and fire regimes need to be identified at the GA scale in addition to (or in replacement of) the forestwide goals. The forestwide goals are not meaningful at the scale of a GA. The diversity between the GA's also makes the numbers important for each GA, especially for the nonforested areas.

EH-DC-VEGNF

The extent of grassland/shrubland/savanna has decreased drastically. The loss of sagebrush and bitterbrush is particularly striking here. Perhaps this can be tied to NRV.

Rocky Mountain Front

RM-GDL-WL

I would like to see a guideline that states livestock grazing will occur in accordance with wilderness area desired conditions (or something to that effect). This guideline should occur in all Gas with wilderness or proposed wilderness and grazing.

Teton Pass Ski resort has been in operation since 1966 and is currently authorized by a long term special use permit which permits winter ski resort development [on] approximately 407 acres.

RM-STD-CMA

For emergency purposes. What constitutes an emergency? Does fire suppression? What happens after the emergency is over?

Upper Blackfoot GA

Special Emphasis and Permitted Areas –somewhere it seems the Stemple Pass Cross Country Ski trails should be addressed...

Divide GA

Bitterbrush is present in the Sweeney Area—unique and important species.

Social and Economic Characteristics—hunting is important in this GA.

Tenmile should be mentioned.

Cultural and Historical Characteristics

Isn't there a historic mining district here? Mining is such a big deal here...

DI-DC-WTR

I would like to see a goal about reclaiming acid mine drainage sites and protecting the water in this GA

DI-DC-VEGF

Hard to think there is still too much LPP, at least mature trees.

DI-DC-SHRA

Invasive species are such an issue here that they should be mentioned

FP Monitoring Plan

I hope the team will review the last FP Monitoring Report that the HNF did in 2012. Some of the elements in the old plan were very useful and worth looking at. Others were not, and are also worth noting.

FP Priority Watersheds

Table 2. Please add the GA that the subwatershed occurs in. This is a pretty short list...

Restoration of Impaired Waterbodies

The HNF Riparian Monitoring Plan should be referenced here, and the data collected associated with that plan.

Conservation Watershed Network

I need some discussion on this.