

Date submitted (Mountain Standard Time): 6/4/2019 6:54:29 AM

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Comments:

First of all, it looks like a vast amount of work went into this document that covers a huge area. Congratulations on getting it done. Just trying to read it all and absorb a few points of concern to me has been an endeavor. Therefore, being short on time to respond, I've ordered my comments by page number and concentrated on a few resource areas.

p 6

(1) The DEIS states "Identifying suitability of lands for a use in the forest plan indicates that the use may be appropriate, but does not make a specific commitment to authorize that use." This language can be used by project proponents to consider it a promise, especially the energy industry. The BTNF got in trouble by calling certain lands suitable for energy development in the forest plan, then on further analysis at the project level, decided that much of the area was not suitable.

Nor does this statement include what the FS will do if unsuitable uses already exist. The reason for this paragraph makes sense but I'm feeling the need for meat on the bones in subsequent sections and more clarity about what is included.

(2) Differences by alternative. This would be an excellent place to quickly describe the issues that led to the identification of action alternatives.

p 6

"Each alternative emphasizes specific land and resource uses and deemphasizes other uses in response to the significant issues." Although I read through the section in Ch 2 that describes each alternative's theme, I'm unsure about how certain resources were handled under that theme. A list of the driving issues, or bullet statements might bring this into better focus. An example: a recommendation for wilderness in the Gallatin Crest is included in Alternative B and not in Alternative D, which emphasizes natural processes and restoration and has much more recommended wilderness than Alt. B. So I wonder why.

p 89

(1) Objectives regarding roads, top of page: isn't this level of specificity budget-related and part of a forest wide road management plan? It seems odd to have differences by alternative when a reasonable schedule for improvement should apply to any.

(2) Regarding dust abatement under standards, bottom of page: there are alternatives to mag water that don't kill the roadside vegetation. Would be nice to at least encourage their use, if not require it.

p 94

Regarding restrictions on use of pack goats, bottom of the page: Wouldn't these apply equally to all alternatives, or are there critical areas as suggested in Alts B and C? I don't see the reasoning for changing the area covered by the restriction - address the problem and apply to all alternatives.

p 97

Table 18: why not include a column that shows the current mix of acres in each category (alternate A) so we can compare what would change under of the action alternatives?

p 98

(1) Primitive settings: If there is a need to add signing or eliminate unauthorized trails, why not estimate the extent of the need and say as budgets allow the FS will do as many per year as possible, rather than pick a very low number? If more money came down the pipe than was planned for signing, would the forest just do what the plan rather than getting more accomplished? Also, this section seems to belong under wilderness/recommended wilderness the way it's stated. There must be similar needs in non-wilderness primitive settings.

(2) Also on this page near the bottom: the suitability section confuses me, and this comment applies to other spots in the document. If the statements included a note that certain activities/facilities are not only unsuitable but prohibited, it would make more sense. A mention of suitability is fine but there needs to be a statement about what is to be done about it-a standard or more that can be directly related.

p 99

SPNM settings, top of page, objectives: under one alternative the forest will eliminate 5 travel incursions per decade (a rather modest goal if you ask me, and I suspect the rate of new incursions will far outpace it); under another alternative none will be eliminated. The way this reads, if unauthorized motorized use is an issue, why doesn't it apply equally under any alternative? Does this mean Alt D will result in non-implementation of the travel plan? It seems that any alternative, even Alt A would assume compliance and implementation of motor vehicle use plans.

p 107

I don't understand why commercial filming and photography is listed under recreation; it's a non-rec special use.

p 111

Scenery guidelines: Lots of guidelines, and no standards. Why?

p 113-114

Designated areas - wilderness desired condition list: these might read better if they were sorted into which of the wilderness character categories they relate to. Right now it's hard to tell on some, and the "other features of value to the wilderness" item seems not to be responded to at all.

p 114

(1) DC 3, "The untrammelled quality of wilderness is essentially unhindered and free from modern human control or manipulation" -- This is fine but could use more detail. Management actions within wilderness should be considered using a minimum tool analysis that emphasizes preserving wildness, natural processes and integrity of the ecosystem. Indirect vs on-site management actions should be primary here, unless minimum tool analysis shows a need.

(2) DC 9, "Human impacted areas and associated resource impacts are not expanding into nearby un-impacted areas" - a bit vague. Say what you're talking about - trails, trampling, campsites or what. Somewhere else there is a mention of trails being relocated to reduce resource damage so wouldn't that contradict this?

(3) DC 10, on user-created trails. I'd word this a bit more strongly, say they are few and inconspicuous. I would also add what is currently found in the backcountry section, the verbiage about minimizing illegal use of motor vehicles and mtn bikes, along with the associated unauthorized construction of trails by these users. A big problem in our area.

(4) DC 14, regarding disturbed areas, "Lands degraded prior to wilderness designation, such old gravel quarries, mine exploratory sites, and weed invested areas, function naturally." I hope this means there will be some action taken to help them start functioning naturally. One could take this statement to mean that in weed-infested areas, natural processes would be allowed to result in weeds spreading and no action would be taken. What is meant here?

(5) Some items not mentioned in this section that should be:

* Private inholdings other than patented claims with existing rights are acquired.

* Outstanding features and other values (scientific, cultural etc as per Wilderness Act) need to be addressed. What is the desired condition for indigenous cultural sites, air and water quality, and so on? Add something in this section about wilderness having properly functioning watersheds whose streams are of a quality to be reference streams and wild/scenic candidates. Add a mention about air quality that complies with set standards. Though the CGNF can't prevent pollution drifting from elsewhere, this would fall into a desired condition statement.

* On the subject of untrammelled wilderness, I think it is always worth taking a stab at sister agencies such as the state fisheries department and "Wildlife Services." Stocking lakes with fish amounts to trammeling. The persecution of predators to support the livestock industry that is already paying next to nothing for the privilege of making a living off public land has no place in wilderness. The land managing agency should have a say in where these actions can be allowed and what means can be used. Also, in case Montana is like Wyoming in refusing to outlaw cyanide bombs on public land, the desired condition would be that none are found in wilderness.

p 115

(1) Goal 04 needs to say more. Recreational fisheries management needs to be clearly constrained by the wilderness action plans to highlight restoration of native fish or fishless lakes where other aquatic creatures may survive. I realize this is a state issue and states are very adamant about their right to stock fish but the FS needs to be more forceful in having them recognize that wilderness is different from the pond down the street.

(2) Objective (only one?) "Per decade, remove three facilities, improvements or uses that are not suitable for wilderness." I have similar thoughts on this as for number of things to do elsewhere per decade, and I also wonder why this is the only objective listed when there are numerous goals and desired conditions. Should there not be more objectives that respond to them?

(3) Standards 03 - 07: These are right out of old plans and the GYA special order from nearly 30 years ago. Have conditions not changed, resulting in a need for change here? As far as I know that special order has never been rescinded, but has been updated a time or two. Is anyone still using it?

I think these standards belong in the wilderness action plans so a forest plan amendment isn't needed each time there's a need to adjust something like party size. I also worry that these party sizes are already too generous. To say 15 people can occupy a high elevation campsite without disturbing it seems absurd. The only groups of that size that I see are guided, and they can be managed through permits. Most backpacking parties are much smaller than the size limit, so why not adjust it now to be more realistic and prevent encouraging ever larger parties?

(4) Also what I see missing from this page: there needs to be something about trails in zone 1. Pristine means no developments, and zone 1 is defined as trail-less, so a standard should be included to disallow system trails and to minimize user-created routes.

p 116

(1) Standard 14 on administrative use of motorized equipment, mention that a minimum tool analysis must be completed and followed.

(2) For recommended wilderness there are standards and guidelines that differ by alternative. None here? I would think, given the amount of "transition" zone that reaches deep into the wilderness on popular trails, that some alternatives might seek to move some of these to a more primitive state. The current zone maps have much more Zone III than the maps for other wildernesses I've seen. Transition suggests a change from trailhead conditions to more primitive, not something you'd expect to find miles into the wilderness.

(3) Guideline 05: are there places where service days should be reduced due to current impacts, or the type of service changed to what is easier on the land? This guideline sets existing use levels as the basis, but is there any analysis of whether there is already too much?

(4) Suitability item 02, "Designated wilderness areas are not suitable for motorized or mechanized transport or for public motorized equipment (such as chainsaws)." In addition to a statement on suitability, there should be a standard that states public use of bikes is not allowed. I can think of no trails in our region's wildernesses that are gentle enough and without poor soils and instability, not to mention disturbance to others from bears to

pack strings, where bikes are suitable. Stating this could stave off the hordes if legislation slips through allowing this non-compatible use.

(5) Suitability item 04, "Permitted livestock use is suitable only in those portions of wilderness where grazing had been established prior to the area's wilderness designation." If historic allotments are in poor condition or an unsuitable place now, is there no way to move the use to somewhere more sustainable? It seems like a number of years back there were bear issues in some of the sheep allotments in the upper Boulder River vicinity and the sheep were given somewhere else to go. Would this now be impossible?

(6) Suitability item 05, "Overnight camping is not suitable in areas where it is demonstrated to cause resource damage (such as riparian compaction, water quality degradation)." It may not be suitable, but the condition of long-established campsites is not likely to change where this degradation is taking place. Most of these sites are in Zone III and in places where soil compaction, exposed tree roots and extensive bare ground are found, within close proximity to water. Once campsites get into this kind of a state, like the ones around Spanish Lakes, further use doesn't create more impact unless that use expands the area of impact. Better to keep these heavily altered sites to a minimum size in their current locations rather than close them and disturb new sites, since these long-used campsites will likely never recover. It would be interesting to take a look at the campsite inventories done in the mid-1980s at some of these lakes and compare to conditions now. What are the trends?

p 117

(1) Table 21, percent acreage in each wilderness zone. I assume this table shows existing condition. Would the acreage of each of these zones change by alternative? It would seem quite desirable in at least one alternative to increase the acreage of Zone II and reduce Zone III which can't really be considered transitional if it's in the heart of the wilderness. Is the forest plan revision just assuming the current mapping of zones will be continued as is with no alternatives? Or will wilderness action plans be updated to address this?

(2) Regarding wilderness action plans. If the 1987 versions are still being used, they need updating and should be completed by a date certain. Without specific direction, there is no contract with the public that clearly lays out strategies for maintaining or improving wilderness character. It appears that the plan would allow continued erosion of wilderness character as it gives no real teeth to the desired condition nor makes strong statement about improving conditions. Updated wilderness action plans can do this.

p 120-125

I'm glad to see a good write-up on research natural areas, natural landmarks etc. These are important and overlooked special areas.

P 127

(1) Standards for eligible wild/scenic rivers: I'm surprised to find only one standard here, addressing salable minerals. I would expect to see similar standards for roads and bridges, structures, energy leasing, water developments, recreation sites and other activities and developments, which would differ depending on whether the eligible river was a potential wild, scenic or recreational river. Without specific standards the forest plan won't assure that the ORVs are protected.

(2) Eligible wild river corridors: timber harvest is mentioned at the bottom of the page, but that isn't the only thing that should be addressed. Roads aren't suitable, nor are motorized trails. Other developments that could impose on the river's ORVs are also not appropriate.

p 128

Table 27. I thought that once rivers have been determined eligible, a suitability study and recommendations for classification would be part of the revised forest plan. If not, when is this meant to occur? Will no recommendations be included?

p 129

(1) In regard to Cowboy Heaven, in my opinion it should have been included with the Spanish Peaks in the Lee Metcalf Wilderness in 1983. I would be happy to see it recommended in the forest plan.

(2) Another missed opportunity from 1983 is the Gallatin Crest. I will support a mix of these alternatives although by now snow machines and bikes, motorized and otherwise, are well established so the options here might be quite limited.

P 130

Standards for recommended wilderness: What about use of motorized vehicles and bikes? Allowing continued or expanding use will preclude any real consideration of these areas as wilderness.

p 130-131

(1) Suitability item 02: Why are recommended wildernesses suitable for motorized vehicles and bikes in one alternative and not another? It seems that they either are or are not, the latter of which is in keeping with national guidelines for recommended wilderness. To me it would be better to exclude established routes from the wilderness proposal than to threaten to close them after they've become entrenched in people's minds. You can't take away uses that are considered traditional, even if the tradition is only a few years old. This inconsistency of management by alternative applies also to items 06 and 08.

(2) Suitability item 09, regarding the use of drones: is there anywhere on the national forest where drones are suitable? They interrupt the enjoyment of the forest for everyone and should be restricted to a few places where there is already much disturbance and noise.

p 133

Recreation emphasis areas, desired conditions: nothing in this section about maintaining the scenic quality.

p 134

Land status and ownership, desired condition. Need to say that while consolidated ownership can be helpful in management, land adjustments must not give away public land with outstanding resources. Too many exchanges I've been involved with result in big bucks for the recipient and loss of access for the public.

p 135

Desired condition for land uses such as energy corridors - add that items 01 and 02 are accomplished in ways that don't interfere with other forest uses or degrade the scenery.