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Comments: Thank you for producing this fuels management plan for the Cooke City area and for accepting public comment on it. I'm a part owner of land along Sawmill Road that borders one of the treatment areas described in the plan. I'm commenting on behalf of myself and the other owners of this parcel.

The plan seems complete and well-intentioned overall, but I have several concerns.

The target post-thinning densities are rather low, at 60-80 sq ft trunk area per acre. This is the bottom of the range I see in studies for stable density, which suggest that carrying capacity for lodgepoles can be up to 300. I don't see reasoning for why this low density is necessary.

The description of the "intermediate" fuels treatment is confusing. The naming ("intermediate") suggests that it will remove mid-size trees. The suggested benefits also suggest this, stating that treatment will separate high and low canopy and remove "ladder fuels." On the other hand, the description also suggests that lodgepole stands are typically thinned from the bottom. Meanwhile, the selection criteria suggest that above 7" diameter will be removed, with no upper size bound. This suggests removal of the largest trees. I'd like to see a clarification of which trees will be thinned in these treatments.

I'm pleased to see that the plan includes buffers around riparian areas. I notice that the plan expects a temporary increase in sedimentation of waterways due to increase in use of river crossings, and exempts road/river crossings from most of the (otherwise tight) restrictions on riparian impact. The plan stresses that this will be a temporary change but makes no effort to determine if a temporary change in sedimentation rates has a longer-term impact.

The plan states that treatment regions will impact roughly a third of the habitat in a lynx management area but suggests that this won't have a significant impact. This seems very unlikely. Relative to other species, the documents say activities will impact habitat but not impact populations. This statement requires justification since typically an impact to habitat will impact population through secondary effects.

There are some contradictory statements in the plan, where a paragraph leads with "there aren't any elements of concern," but lists several. This leads to a dismissive tone in the plan's treatment of potential impacts on animal species, water, and overall ecosystem health.

I don't oppose a plan of this type near roads in the area but I would like to see an environmental impact statement covering the impacts on species that will experience habitat disruption, waterways that will experience ecosystem disruption, and the overall health of forest habitat that will be reduced to the lowest possible healthy densities, possibly by removal of the largest trees.