

Feb 1, 2016

Randy Moore, Regional Forester
U.S. Forest Service, Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

Sent via Cara at: <http://tinyurl.com/earlyadoptersfpr>

RE: Comments on Inyo National Forest Wilderness Evaluation

Friends of the Inyo and the Sierra Club would like to provide our comments on changes to the Wilderness Evaluation released to the public December 15, 2015.

Friends of the Inyo is a locally-based nonprofit conservation organization dedicated to the stewardship, exploration, and preservation of the Eastern Sierra's public lands and wildlife. Over our 29 year history, Friends of the Inyo has been an active partner with the Inyo National Forest, initially providing public comments on actions stemming from the Forest's previous forest planning process to today where staff, members, and volunteers contribute well over a quarter of a million dollars in in-kind labor, interpretation, and support across nearly every professional Forest discipline. As of 2016, we represent the voice of 730 members who are residents and visitors to the Inyo National Forest.

The Sierra Club represents hundreds of members locally in Inyo and Mono Counties as well as many thousands more across California and the nation who are committed to the sound management and protection of the public lands, wildlife, and waters of the Eastern Sierra, including the Inyo National Forest. Sierra Club members visit and enjoy the Inyo National Forest for a wide array of activities including hiking, camping, fishing, and off highway driving.

We thank the Inyo National Forest for including four additional areas for consideration within the DEIS. We hoped the release of new information would provide the public with some clarity on the wilderness evaluation. Although the overview map provided a general location of the additional areas, better maps were needed for the public to adequately assess the proposed boundaries, roads, and features of the area. Just this week we received news that these maps are available at the Supervisor's Office in Bishop. Making these maps available on the Region 5 planning website will be much more valuable to the public, especially given the extremely limited time to review them and provide comment. Additionally, a zipped package similar to that made available for the Wilderness Inventory would be extremely helpful for public assessment of the Evaluation.

We recommend Inyo staff review and carefully consider the names of the ten areas and any other areas that may be brought forward for analysis prior to the release of the DEIS. For example the true Harkless Flat is a popular motorized recreation area

and naming a potential area called Harkless Flat within polygon 1246 has created unnecessary confusion. Solider Canyon falls within this area so we suggest the potential 10,037 acre Harkless Flat be renamed to Solider Canyon, and the current Solider Canyon (15,445 acres) be renamed Deadman Canyon which is the most prominent feature of the area. Corrections from "Pilot Mountain" to "Piper Mountains" wilderness addition should also be made in the DEIS. The acreages for consideration under alternative C of the evaluation polygon 1281 appear to be an error. Combined acreage of alternative C for the east and west White Mountain additions would total 9,320.

One of the main concerns with the current evaluation is the continued absence of information regarding how the agency has weighed and compared the relative wilderness characteristics of each evaluation polygon to determine which areas or portions of areas to carry forward for analysis within the DEIS. The information provided through narratives and maps does little to explain why certain roadless areas on the Inyo National Forest made it into the DEIS and others did not.

We reviewed the evaluation narratives, with special attention to the ten areas currently being considered and the additional areas we preliminarily recommended for wilderness recommendation in our scoping comments and November 2014 wilderness evaluation comments. We reiterate our desire to see additional areas in Mono County carried forward for consideration in one or more of the alternatives of the DEIS. Inyo County has nine of the ten PWAs under DEIS consideration when in fact Mono County contains RARE II areas deserving of consideration and environmental review within the DEIS.

We are concerned the Forest Service has misapplied the wilderness evaluation criteria in section 72 of the Chapter 70 directives, Forest Service Handbook (FSH) 1909.12, ch. 70, § 72. The Forest Service should correct deficiencies in its final wilderness evaluation narratives, including the wilderness character descriptions of "naturalness" and "ecological integrity". The narratives should not be used to determine which areas to carry forward for DEIS analysis or used to decide which areas to recommend for wilderness designation.

We support the inclusion of Glass Mountain (polygon 1012) within the DEIS, however we believe this area should be considered in the preferred alternative. The Glass Mountains are the only east-west trending mountain range in the Eastern Sierra and thus contain a mix of Great Basin, Mojave, and Sierra ecotypes. This unique combination of characteristics makes the Glass Mountains truly deserving of permanent protection.

Recommending this area for wilderness would also help to protect this unique area from motorized recreation. Although the Glass Mountains do not reliably receive substantial snowfall, there are times when the snowpack is deep enough to support over-snow vehicle (OSV) use. We feel that it would be better for the Inyo National Forest to focus OSV recreation in the existing winter recreation management areas

on the Forest and to manage the roadless areas of Glass Mountain to protect their wild character and unique ecological characteristics.

Compared to the more than 40,000 acres of roadless land within the Glass Mountain polygon, only 17,433 acres are being considered. Given the agency's desire to include more underrepresented ecosystems in the national wilderness preservation system, more of the lower elevations of roadless lands surrounding Glass Mountain should be analyzed for wilderness character and manageability within the DEIS. The entire Sentinel Meadow RNA should be included in the potential wilderness boundary (Sentinel Meadow is a timber pine RNA and contains very little sagebrush). Managing habitat for the Bi-state Sage Grouse is a priority for the Inyo National Forest and likely for this reason, many roadless acres of sage grouse habitat are not being considered within the DEIS. Aside from the fact that manageability should be reserved for NEPA analysis, wilderness designation addresses many of the primary threats to this species by preventing further habitat fragmentation. Habitat fragmentation is a primary threat to sage grouse along with conifer encroachment. We acknowledge the treatment of conifer encroached sagebrush is needed across much of the Bi-state population's range. Language in the Wilderness Act provides the agency with the discretion to undertake measures needed to curb conifer encroachment within wilderness to protect priority resource values like sage-grouse habitat. We ask the agency not to preclude certain areas from wilderness consideration simply because they have priority sage grouse habitat.

Other special wild places on the Inyo may be best suited for special management. We reiterate that on the Inyo National Forest, Special Interest Areas and other alternative designations should be brought forward and analyzed in the Draft Environmental Impact Statement.

Excelsior Mountains (Polygons 1355, 1357, 1361)

We continue to believe these polygons should be brought forward for consideration within the DEIS. The narratives acknowledge many of the wilderness characteristics and opportunities for solitude but fail to mention the contiguous inventoried roadless areas on the Humboldt-Toiyabe National Forest east of the CA-NV line, and the landscape level habitat connectivity that relates to these wilderness characteristics.

Management trade off considerations, such as with wild horses, are appropriate in a NEPA analysis context and not within wilderness evaluation polygon narratives. The Excelsior polygons (and many other INF polygons) contain examples of management trade-offs described under "manageability" that are intended for discussion *within* the DEIS, not evaluation narratives. The potential need for active management of sage grouse habitat and wild horse herds are management considerations that should be analyzed under NEPA. In the context of a manageability analysis for the Montgomery Wild Horse Management Area (MWHMA) within the DEIS, there are numerous examples of existing wilderness

areas with successful wild horse management programs. Designated or recommended wilderness (and WSAs) where agencies are able to manage feral horse herds while maintaining wilderness characteristics, include the Boundary Peak Wilderness in Nevada, the Cumberland Island National Seashore and Wilderness in Georgia, Little Bookcliffs WSA in Colorado, McCullough Peaks and Adobe Town WSAs in Wyoming, and Cedar Mountain Wilderness in Utah. Wild Horses are not incompatible with wilderness and in fact are one of the many wilderness values of the Excelsior area. It appears the MWHMA is being used to justify the exclusion of the Excelsior polygons from consideration within the DEIS.

Dexter Canyon (1068)

We have been advocating for the consideration of Dexter canyon since the wilderness evaluation process began. This IRA is perhaps the most geographically varied and ecologically rich on the north zone of the Inyo National Forest. We are concerned about the categorization of moderate ecological integrity. Measures of ecological integrity should be based on scientific data and should evaluate *the apparent naturalness as required* under the Wilderness Act and the Chapter 70 directives. This is one example of many narratives that simply categorizes the relative ecological integrity of an area without scientific data or assessment of apparent naturalness. The narrative for Dexter Canyon lacks any evaluation of how the area appears to the average visitor. The justification of sheep grazing and associated infrastructure used in this polygon narrative is irrelevant given that grazing is a commonplace activity on Forest Service land in non-wilderness, recommended, and existing wilderness and may or may not impact the apparent naturalness of the area. The same is true for mining, fish stocking, timber, and other human use activities. We recommend the narratives be revised to describe how the area's ecological conditions and communities and human uses of the area, *appear* to the average visitor. In our experience with our members, visitors to Dexter Canyon appreciate the area for its apparent naturalness and ecological diversity.

We also reiterate a modified boundary of the polygon that was provided to staff over a year ago that would exclude roads and motorized trails and encompass a larger section of the roadless core area. It is meant to be an example of a modification that excludes motorized system routes and includes the roadless core of the southwestern portion. This or a similar modified boundary could be incorporated and reviewed in one or more alternatives of the DEIS.

Lower Lee Vining Canyon to June Lake Loop (Polygon 1179)

The polygon is oddly shaped because it is a lower elevation addition to an existing wilderness and within these lower elevations there are private inholdings and some roads up to the polygon boundary. The boundary of a proposed wilderness addition could be modified to eliminate or cherrystem roads and avoid private inholdings.

The polygon description fails to acknowledge the mature, mixed conifer forests in Gibbs, Bloody, and especially Sawmill canyons and that these extensive, old-growth mixed conifer forest are currently poorly represented in existing wilderness on the

Inyo National Forest. There is acknowledgment of Limber Pine in Bloody Canyon, an important consideration within a NEPA analysis. As the agency well knows, current and historical stocking of fish does not preclude the area from wilderness consideration. We agree the area has high ecological integrity, and appreciate the inclusion of public comment regarding ecological characteristics. However, our previous comments on how to properly assess ecological integrity apply. We recommend the narrative be revised to describe how the area's ecological conditions and communities and human uses, *appear* to the average visitor. Management for Sierra Nevada Bighorn Sheep currently occurs in existing wilderness and is not incompatible with recommended wilderness management. Fish stocking, Bighorn management, and other management trade-offs should be analyzed in the DEIS.

Adding to existing wilderness enhances the opportunity for solitude and primitive recreation and may protect lower elevation areas that include ecosystems currently underrepresented in the National Wilderness Preservation System. It is concerning that certain additions to the John Muir and Ansel Adams Wildernesses along the Sierra Escarpment have not been analyzed for consideration, for example polygon 1179.

Conclusion

In summary, we support the ten areas currently considered for potential wilderness recommendation. In particular, we support including in the preferred alternative the recommended additions to the existing South Sierra, White Mountains, Inyo Mountains, and Piper Mountain Wilderness areas. We also support the "stand alone" areas recommended for protection, including the Glass Mountains, Deep Springs North, Harkless Flat, and Solider Canyon. We are pleased the Forest Service has added additional areas on the Inyo National Forest and identified deficiencies in the evaluation process. However, more work is needed to ensure compliance with the new planning rule and Directives. After corrections to the evaluation criteria and narratives are made, the Forest Service should use input from the public to further identify areas to carry forward. The Forest Service should analyze more areas within the DEIS, particularly in the northern part of the Forest to meet NEPA regulations under a reasonable range of alternatives. We look forward to discussing the establishment of alternative designations for other deserving roadless areas throughout the Inyo National Forest. Thank you for the opportunity to provide comments on this important component of Plan Revision.

Sincerely,

Jora Fogg
Preservation Manager
Friends of the Inyo
819 N Barlow Ln
Bishop, CA 93514

760-873-6500
jora@friendsoftheinyo.org

Frances A. Hunt
Eastern Sierra Organizer
819 North Barlow
Bishop, CA 93514
760-873-6500
fran.hunt@sierraclub.org

CC: Mike Dietl, Christina Boston