September 29, 2014

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Sent to: R5planrevision@fs.fed.us

RE: Proposed Action, Notice of Intent, and Wilderness Evaluation Comments
Forest Plan Revisions, Region 5 Early Adopter Forests

Thank you for the opportunity to comment on the Proposed Action (PA) and Notice of Intent (NOI) documents for the Region 5 Early Adopter Forests. 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 25 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 initial forest planning process to today where staff, members and volunteers contributed well over a quarter of a million dollars in in-kind labor, interpretation and support across nearly every professional Forest disciple.

These comments follow our comments submitted on Desired Conditions and Need to Change documents released this past spring, as well as build on extensive comments submitted during the Forest Assessment phase throughout 2013. This letter follows the PA outline and cites in text language where appropriate. In these cases, our comments will reference first the plan component, followed by its number.

General comments

The Proposed action (PA) lacks adequate standards and does not contain any objectives. Friends of the Inyo believes the Forest Service must detail enforceable, mandatory standards in forest plans to ensure Forest resources are adequately managed and protected throughout the life of the plan. The National Forest Management Act requires that standards and guidelines be used to "ensure" the protection of various resources such as soil, watershed conditions, and wildlife diversity (16 USC §1604). Additionally, the 2012 planning regulations make clear that every forest plan must include standards as one of five plan components (36 C.F.R. §219.7). Standards are the only plan component that can ensure the planning mandates found in the 2012 NFMA regulations are satisfied.

While we recognize the role adaptive management will play in final forest plans, and because adaptive management means planning for uncertainties, the Forest should try to anticipate possible changes to standards and provide mechanisms for their adjustment. Early in the planning process is the time to begin building adaptive management strategies and accounting for uncertainty. Enumerating and adopting meaningful standards will not hinder "adaptive management", but rather form the foundation for it to work. We recommend the use of default standards or possible tiered standards to plan for uncertainty. Standards must be coupled with language for funded and scientifically credible monitoring programs in which monitoring data is tied back into the decision making process. The fact that many sections of the proposed action are missing standards all together is of particular concern. Following the 2012 Rule, standards should center on establishing ecological integrity and developing diversity criteria for at-risk species, riparian and aquatic habitats, as well as eastside terrestrial habitats.

Another key concern is the complete absence of objectives in the PA. The desired conditions described throughout the PA are well written and reflect a meaningful USFS conservation mentality. However, plan components that follow desired conditions need to have metrics that tie back into them. One way to achieve desired conditions is through measurable objectives that trigger actions to meet a standard when a desired condition is not achieved. With this methodology, objectives and standards become part of an adaptive management cycle. A robust monitoring program must form a key piece this adaptive management cycle. In its current form, the PA lacks direction to collect baseline data and then reoccurring monitoring in order to achieve desired conditions. The PA and the final plan must have an effective way to track and guide project-specific and cumulative management actions. It is impossible to write a plan Forest staff can use throughout the life of a plan without meaningful objectives to guide management and project activity.

Eastside terrestrial vegetation

Thank you for including eastside vegetation types and adding our oak habitats. The 2012 planning rule requires the Forest Service to develop plan components that reverse and restore damaged habitats, and standards and guidelines must reflect this mandate.

Standard #1- this standard should also include sagebrush and pinyon-juniper habitats, which also contain fragile biological soil crusts.

Guidelines #2- Projects should always include using native species seed appropriate for the project area. Native seed is needed to support each and every restoration activity. Locally sourced, native seed will be the most resilient to climate change. This is especially critical for genetically variable, site adapted species such as *Artemesia* spp.

Guideline #4- Restoration projects need to include post-project monitoring. Hand removal operations should be a first consideration on each project area "to leave large extents of undisturbed vegetation" and "minimize the risk of non-native species spread".

Old Forest and Complex Early Seral Habitats
During the 1988 planning process on the Inyo, stakeholders worked very hard to ensure the Land Management Plan included language on Old Forest Emphasis Area (OFEA) land allocations. Although the OFEA may need updating, the fact that it is not being carried forward into the new plan with no explanation of what the new management of complex early seral will look like, is very troubling. Large diameter trees, downed woody debris, and snag retention and recruitment are critical metrics to guide forest management. New plan components need to detail complex seral stage requirements (e.g. 10% of each seral stage represented) and snag density and recruitment requirements. Managing for old forest and complex early seral habitats will aid in recovery of many forest plant and animal species currently on the Species of Conservation Concern list (also see comments on at-risk species). Forest complexity is key to early seral communities and "complex" should be defined in the plan. "e.g. abundant organic material (seeds, spores, fungi, live or partially burned trees and logs, shrub) that persists on site regardless of fires or other natural disturbances".

At-risk Species
Ninety-two species on the Inyo are suffering population declines and some are at risk of extinction. These plant and animal species are an indicator that the health of our national forest is in peril. The 2012 planning rule requires the Forest Service to 1) maintain or restore ecological integrity of our national forests, 2) maintain viable populations of all species in the area, and 3) contribute to the recovery of federally listed species. The PA needs clearer language on how the new plan will guide the protection and restoration of these species. There are a number of important species missing from the PA. Notably, the PA should include Sierra Nevada Bighorn Sheep (and how the Inyo will use this listed species' Recovery Plan), Pine Marten, and Willow Flycatcher. Objectives for at-risk species should include establishing ecological integrity and developing diversity criteria. Standards need to be added to this section to limit (and, if necessary guide) project activity to ensure viability requirements for a species. The language of the PA either defers conservation measures to a later time or omits certain species entirely. It is contradictory to include new management areas and practices in the plan without addressing conservation measures, as many management actions will directly impact habitat quality and add stressors to at-risk species.

Black-backed Woodpecker
On the Inyo, Black-backed Woopeckers (BBWO) are fire followers, using burned trees with variable or high fire intensity for nesting and foraging. Ideal habitat includes 12 or more continuous acres, dense conifer snags of 80-800 snags/acre >9"dbh, with 40-100% pre-fire canopy closure[1]. Fire management plan direction

[1] Britting, S. et al. 2012. National Forests in the Sierra Nevada: A Conservation Strategy. Sierra Forest Legacy. August 27, 201; revised in part March 14, 2013. Available at: http://www.sierraforestlegacy.org.

needs to account for BBWO and other fire following species. The introduction of fire with mixed severity effects will create BBWO habitat; this has been amply demonstrated and documented within prescribed fire polygons on the Inyo National Forest. Tree mortality is especially beneficial to BBWO and plan direction can delineate what percentage of tree mortality is acceptable to manage for BBWO's within fire prescriptions.

Northern Goshawk
Standards need to include designating goshawk post-fledgling areas of approximately 420 acres around nest sites[1]. Fire management should be used to create variability in forest structure. Standards for Goshawks on the Inyo should limit harvest of large diameter trees, maintain understory vegetation around enforce limited operating periods.

Bi-State DPS Greater Sage-Grouse
Thank you for writing an extensive section on bi-state sage grouse with a multi-scale approach to sage grouse habitat. However, the proposed action is not adequate to guide management and plan for projects that will maintain or restore the integrity of terrestrial ecosystems in the plan area in accordance with the 2012 Rule (36 CFR 219.8(a)(1)). The key desired condition at the landscape scale should detail adequate nesting and brood rearing habitat. Objectives need to quantify how much nesting and brood rearing habitat is needed to provide for a population meeting the viability requirement of the 2012 Planning Rule. Plan components for sage grouse need to include wet meadow habitat, which are vital to the brood rearing life stage. Objectives are needed to guide monitoring and restoration of meadows used by grouse adjacent to sagebrush. The plan must include provisions to assure sufficient grass cover height for not only brood-rearing habitat but also nesting habitat. Please add provisions for Lek buffers to prevent disturbances to grouse breeding activities and provisions to prevent cheatgrass incursion throughout sage-grouse habitat.
Standard #9- We recommend forest-wide range utilization standards be revised for critical habitat of grouse. Populations of grouse occurring within grazing allotments need to be monitored before and after periods of grazing.
Standard #11- We recommend changing this standard to: "when seeding, locally sourced native plant and seed material shall be used."
Standard #17- Let down fences are an important sage grouse conservation tool, but permitees should be responsible for let down at the end of the grazing period. Any new fences built in grouse habitat should be let down fence with fence markers. Unused and unnecessary fencing in sage grouse habitat should be identified and prioritized for removal.

Willow Flycatcher
To address dramatic declines in the endangered species of Willow Flycatcher, the new plan should manage current and historic breeding locations of meadows larger than 10 acres that have standing water on June 1 and a deciduous shrub component (predominantly willow and rose on the Inyo). These management areas must

exclude grazing of sheep, cattle, and horses, redirect recreational activity, and restore or close roads adjacent to WIFL breeding sites. The goal of WIFL management, based on the Best Available Science, is to limit cowbird parasitism, restore vertical gradients in shrubs, and restore hydrologic function to the meadow system.

American Marten
It would be helpful to see a management zone for marten between Mammoth Lakes and June Lake, west of 395, where old forest habitat structure is maintained and enhanced. More research needs to be done on marten within the Inyo National Forest. Den and rest sites should be located within four years of forest plan implementation to inform management actions. Meadows and grasslands associated with small mammal prey base should be tied into marten management objectives. A region 5 marten management plan should be development. This could be tied into the three forest DEIS and reflected in each Forest plan.

Toad and Frog Management
For some species, such as the recently listed Yosemite Toad, no changes to the existing plan are proposed ("Current direction specific to these species will be retained"). The recent decision by USFWS determined that current grazing practices and other actions controlled by the plans were contributing to the decline of this species[2]. This is another example of deferring conservation measures until a later date in plan revisions. The likelihood of a plan contributing to recovery of a species and not resulting in additional threat will increase if conservation language is added early on in the planning process.

Rangeland, Forage and Grazing
Although Range was discussed in both Desired Conditions and Need to Change, the PA does not include a section on range management. If the DEIS will not contain a section on this topic the PA should clearly indicate why.

Plan revision should detail prescribed grazing rest period for post-fire recovery. Range management on the eastside is overdue for an updated range infrastructure inventory, including but not limited to: active and abandoned fencing and water facilities, as well as artificial water sources constructed for game enhancement. Due to range staff capacity, implementation of this could occur through partnerships with local organizations. This section also needs to identify specific Great Basin range management components, as these differ greatly from western slope rangelands.

Invasive Species
Given the depth and breadth of Cheatgrass invasion on the Inyo, the forest should add an objective to create a Cheatgrass management plan. Objectives should include post-treatment plans and post-project monitoring and restoration that

[2] Federal Register (24516). Vol 78, No. 80, Thursday, April 25, 2013

would be incorporated in every Forest action. Cheatgrass rapidly invades disturbed areas, so all approved project work done, particularly when looking at restoration activities, mechanical treatment, logging, road construction, livestock grazing, and other development, should require and fund post-project management strategies. Developing cost-recovery strategies will allow project proponents to be responsible for the cost of invasive species management. This section of the PA needs considerable work to add standards for weed-free hay, livestock rest purging periods, and measurable language on weed infestations (such as ">2% invasive cover will trigger weed control action").

Timber

Tradeoffs of ecological values for economic value should be explained in plan components to help calculate timber objectives. Calculations and associated units of timber volume should be consistent across all USFS planning documents. At the June public meeting, we viewed timber suitability maps (created for each forest) but there is no reference to these maps or their applicability within the NOI or PA. The PA should include standards that limit salvage logging in order to protect complex early seral forests and fire following at-risk species. Standards should also prohibit the practice of plantation reforestation and have DBH limits to protect the last remaining old growth trees and snags on our Forest.

Fire Management

While we appreciate the development of four new wildfire defense zones, it would be helpful to understand how these each will be managed differently for conservation. For example, in order to protect at-risk species such as Northern Goshawk and American Marten, there should be canopy cover limitations built into standards. Currently there are inconsistencies between the desired conditions for fire management and the protection, restoration, and maintenance zones regarding vegetation management and natural range of variation. It would be ideal for plans to map and describe locations of these fire protection and restoration areas, where the information is already available. Identifying each zone as a management area is a critical part of the plan and will reduce the likelihood of plan amendments over the next decade.

Aquatic and Riparian

Previous standards to protect the hydrological function of meadows have been proposed for removal from the forest plans. These standards have, to date, been instrumental to requiring that actions not disrupt the hydrologic function of meadows. The lowering of the water tables and subsequent drying are the most significant impacts on meadows. The plan needs proper monitoring and management of recreational resources, roads, trails, grazing allotments, and other activities that are stressors on meadow systems and may be degrading hydrologic function. Watersheds that are functioning at risk need to have strict grazing limitations written as standards. (i.e: "Streams functioning at risk will be excluded from grazing until proper function condition is restored", "if streambank trampling exceeds 5% specialists will assess ecological condition and trigger necessary

management action") The Best Available Science shows grazing is a main stressor on these creeks and streams that are functioning at risk. The PA should be revised to include standards that will reverse the decline of meadow-associated species. At-risk species associated with meadows (Yosemite Toad and Willow Flycatcher) have significantly declined or been extirpated from historic sites, yet the PA does not explain how it will manage meadow habitat for these species.

Recreation

USFS proposed directives mandate "plans must include plan components, including standards and guidelines, to provide for sustainable recreation…" The Inyo boasts over 1,200 miles of hiking trails, 2,300 miles of motorized routes, and ample opportunities for every recreational use. With over 2 million visitors a year, the second highest in California, the Inyo supports a recreation-based economy for communities along Hwy 395, benefiting local businesses and providing important sales tax revenues to local governments. Recreation is the key resource for us. There are 455 developed recreation sites, many of which are often filled to capacity much of the summer.

800,000 acres (48%)of the Inyo is preserved as wilderness. We are seeing increased use of wilderness and backcountry settings, and some of our heavily visited areas such as the John Muir Trail are experiencing profound impacts. Our members, long time residents, and visitors regularly report illegal camping, fire-rings, cat-holes, and trash left in popular wilderness destinations. There is an opportunity for improved education and interpretation for wilderness users. The Sierra and Stanislaus National Forests provide a good example of a Forest's ability to protect the resources of the backcountry and provide a positive visitor experience through the use of trained volunteers and ongoing partnerships. The Assessment (2013) recognized infrastructure and facility maintenance as being major challenges for sustainable recreation. The use of effective partnerships will be key to addressing these challenges.

In 2010 the Washington Office released the *Framework for Sustainable Recreation*- a guiding document for future forest plans. Plan components should directly address the Framework in the following meaningful ways:

III. "Enhance communities"

Situated along why 395 the Inyo is in a unique position to work with its "Gateway communities". Residents and visitors alike access Forest land for recreation. Recreation based dollars contribute to making these communities viable. Economically strong communities are then able to help the forest leverage their own funds to implement recreation management. Recreation supports the local economy and many of those who choose to live here.

IV. "We will evaluate areas… that have outstanding recreational, scenic, historic or other values of high attractiveness for designation and management as special places"

Outside of the mandated Wilderness and Wild and Scenic River evaluations, the current plan revision documents largely ignore public recommendations to review special designations for outstanding corners of the Inyo.

IX. Financial Foundation: "program delivery will be balanced on a base of appropriated funds through expanded capacity by utilizing user fees, volunteers, private providers, and partners from the non profit sector"
Currently, 98% of fees from Forest managed campsites and facilities remain on the Forest while facilities managed by external concessionaires are lost while the public supports maintenance and upkeep of these privately run, public facilities. The Forest should detail plans to increase local fee retention using tools authorized by the Federal Lands Recreation Enhancement Act. Most importantly, the Forest should review returning concession managed facilities to public management.

The use of special designations such as Recreational Areas or other special interest areas may allow funds to stay on the Forest with if the area is granted fee retention authority Recreational designations can help build a strong financial foundation for sustainable recreation.

V. Forge Strategic Partnerships: "streamline our partnership processes and increase our capacity to engage and support partners"
Volunteer or partnership coordinators on other forests (a current position on the Sierra National Forest) have helped further those forests' goals of increasing capacity through partnerships. How we will develop and maintain such partnerships should be written as measurable and specific plan components. Some recommendations to strengthen this section of the plan are:

- Work collaboratively with partners to design and implement maintenance and rehabilitation projects in identified recreational areas.
- The NOI states the ROS classes will be modified (pg 9). It is unclear in the PA what the modified ROS classes will be. Discussing these classes and the development of ROS-based overlay zones to help inform and prioritize recreational management.
- Build the use of partnerships into standards so that recreation staff can use partners to achieve their goals even through changes in Forest leadership
- Strategy #8- The Recreation Facility Analysis (2007) needs to be updated and its use built into plan components that go beyond decommissioning sites and capital investment to include a rotational monitoring schedule and deferred maintenance priorities. An additional inventory and evaluation of interpretative signage and programming is needed and will help identify areas of opportunity for interpretative programming (this directly relates to the Interpretation and Education portion of the plan).

Cultural Resources
In the Proposed Action cultural resources Desired Conditions state: "Vandalism, looting theft and human-caused damage to heritage resources are rare." Since only a fraction of cultural resources on the Inyo have been documented, there is no way of

knowing when or how much vandalism is occurring. Inventory of cultural resources has to be addressed in the new plan. Currently, there is no budget for inventory or recordation unless such actions are project-driven. This usually happens after unique and non-renewable cultural resources have been damaged, not before.

Cultural resources are not a renewable resource and should be recognized as such in the revised plan. Additionally, in the experience of our staff and volunteers this statement is incorrect. Many cultural sites across the Inyo National Forest are known to be pilfered of their Native American or early mining historical artifacts. It is impossible to achieve the desired conditions outlined in the PA without addressing the need to inventory the forest for cultural resources, and then regularly monitor and steward these resources. Plan objectives can perhaps develop prioritized surveys for cultural work. Two areas to prioritize cultural management are the Excelsior area and the White-Inyo Bridge. These two areas have been shown (by limited archaeological work in the 1970s and 1980s) to be of particular importance to earlier inhabitants of the region, and the archaeological sites located in those two areas contain information vital to our understanding of prehistoric land use and human adaptation to environmental changes.

Wild and Scenic Rivers

The PA should include a forest wide, systematic, and comprehensive inventory and evaluation of candidate WSR streams. The suitability of any eligible stream segments identified in this process should be determined within the PA and appropriate recommendations made to Congress. Agency assessments suggest that the 20 year-old management plans for existing WSRs are out of date and that new management measures are required to protect their outstanding values and water quality. In addition, the Owens Headwaters and Cottonwood Creek WSRs (designated in 2009) have no existing management plans. The PA should mandate updates on dated management plans for existing WSRs and mandate management plan creation for those that do not have them. The following recommendations come from collaboration with Friends of the River.

Hot Creek and Rock Creek

After the Inyo Forest identified 19 eligible streams in 1993, the Bishop Field Office of the BLM identified as eligible segments of Rock Creek and Hot Creek directly downstream of the eligible segments identified by the Forest Service. We recommend the Forest Service and BLM coordinate and complete joint suitability studies of all the eligible segments on Rock Creek and Hot Creek in plan revision.

Mono Lake Tributaries

When the Inyo Forest identified 19 eligible stream segments in 1993, the court mandated restoration of flows in tributaries to Mono Lake had not yet been fully implemented. Restoration of flows in Lee Vining, Rush, and Parker Creeks warrants consideration of these segments for WSR eligibility and suitability in plan revision. Restoration of flows and aquatic habitat in these stream segments certainly meets "the changed circumstances that warrant additional review" criteria in the 2012

Forest Rule. Similarly, a combination of FERC relicensing and water rights decisions have restored flows on lower Mill Creek and there may be new resource information available, so reconsideration of this stream is warranted as well. We recommend plan revision provide the appropriate opportunity to complete eligibility and suitability studies for these streams, which are vital to Mono Lake – a nationally recognized natural resource icon. The Forest Service should complete eligibility and suitability determinations for these streams in plan revision.

Big Pine, Lone Pine, George, & Independence Creeks
Another changed circumstance that warrants additional review is the unfortunately disparate timing of the Forest Service and BLM eligibility assessments in the eastern Sierra. Because the Forest Service and BLM failed to coordinate their WSR study efforts, there are four instances where stream segments flowing on both National Forest and BLM lands are identified as eligible by one agency but not the other. Segments of Big Pine Creek and Lone Pine Creek were identified as eligible by the Forest Service, but downstream segments managed by the BLM were not. Similarly, segments of George and Independence Creeks were determined eligible by the BLM but upstream National Forest segments were not. It's reasonably to assume that the free flowing condition and outstanding values of these streams do not end at relatively arbitrary jurisdictional boundaries. We recommend the Forest Service and BLM consult and coordinate joint eligibility and suitability determinations for these shared stream segments.

Deadman Creek
Congress designated the Owens River Headwaters Wild & Scenic River in 2009. The federally protected river includes segments of Glass and Deadman Creeks from their sources high on San Joaquin Ridge downstream to Big Springs and the Owens River.

The 1994 eligibility study conducted by the Forest Service identified only a short segment of Deadman Creek, between its confluence with Glass Creek and Big Springs, to possess outstandingly remarkable recreation value. According to the Forest Service analysis, segments of Deadman Creek upstream of the Glass Creek confluence lacked outstandingly remarkable values and were therefore ineligible for protection. However, Congress chose to protect all of Deadman Creek from its source on San Joaquin Ridge as part of the Owens River Headwaters Wild & Scenic River, which constitutes a de facto finding that the upper segments of Deadman Creek do indeed possess outstanding values.

As part of the development of the Inyo National Forest Plan Revision, the Forest Service has acknowledged the need to establish the protected river corridor for the Owens River Headwaters Wild & Scenic River and complete a Comprehensive River Management Plan (CRMP) for the river. One of the important functions of the CRMP is to identify and provide detailed information about the specific outstanding values of the river requiring protection under the Wild & Scenic Rivers Act.

Since the Forest Service's 1994 eligibility study, the agency and the public have grown increasingly aware of the unique wildlife-botanical-ecological values of the San Joaquin Ridge, which encompasses the upper watershed of Deadman Creek. It is critical that the specific outstanding values of the entire creek be formally recognized by the Forest Service if the agency is to meet its commitment under the Wild & Scenic Rivers Act to protect such values.

The outstanding remarkable values of upper Deadman Creek include:

- Recreation – An outstanding value shared with lower segments of the Owens River Headwaters, upper Deadman Creek offers two developed campgrounds, a group campground, plenty of opportunities for dispersed camping, and a trail, which provides outstanding opportunities for backpacking and hiking.
- Geological – Deadman Creek also shares identical geological values with Glass Creek. The unique geologic feature of White Wing Peak, a specific outstanding geological value of Glass Creek, forms the divide between Glass and upper Deadman Creeks. Assigning this outstanding geological value just to Glass Creek and not Deadman Creek is simply arbitrary (particularly when the streams are tributaries to each other).
- Wildlife –Yosemite toad, one the specific outstanding wildlife values cited for Glass Creek is also found in upper Deadman Creek. In addition, the creek is a significant migration corridor for mule deer and provides important summer habitat and fawning areas. The ridge and creek also provide a trans-Sierran corridor for furbearers, including marten and possibly wolverine. The area may provide foraging habitat for the California spotted owl, which have been sighted just over the San Joaquin Ridge crest.
- Botanical-Ecological – Upper Deadman Creek encompasses a portion of the Forest Service-identified "largest Jeffrey pine forest in the world" as well as rare eastside stands of old growth red fir. The area also supports a highly diverse and rich understory of plant species representing seven floristic zones. The relatively low elevation of the Sierra crest at Deadman Pass (a.k.a. the Mammoth Gap) is an effective migration corridor for the post-volcanic disturbance colonization of flora from west to east. The area is also home to two rare plants, one of which may have originated in this area.

We recommend the Forest Service identify outstandingly remarkable recreational, geological, wildlife, and botanical-ecological values for upper Deadman Creek as part of plan revision and in preparation for a Comprehensive River Management Plan for the Owens River Headwaters Wild & Scenic River.

Dexter and Wet Canyons

Dexter and Wet Canyons were not included in the 1993 list of eligible streams. It is not known whether these ecologically unique streams were considered at all. The relative wetness of Dexter and Wet Canyons in a distinctively dry area is due in part to the Pacific moisture plume that makes its way east over Deadman Pass in the

Sierra crest to a unique in the eastern Sierra transverse range formed by Bald and Glass Mountains and their associated highlands. Dexter and Wet Canyons are the primary drainages in the most geographically varied and ecologically rich region of the northern Inyo National Forest. The streams have created deeply incised steep-walled canyons reminiscent of the desert southwest, flowing through a landscape of rough hewn granite knobs, rolling uplands, and flat volcanic mesas.

Major meadows complexes (Crooked Meadows, Sentinel Meadows, and Wet Meadow) are the sources of Dexter and Wet Canyons and their tributaries. Locally limited but ecologically critical riparian habitat, including aspen groves, willow thickets, bunch grasses, and sedges are thick along the banks of both creeks. The uplands are dominated by old-growth lodgepole and Jeffrey pine forests, open sagebrush plains, and extensive snowbank aspen groves (distinct from riparian aspens). The incredibly diverse habitat provided by these streams supports goshawk, greater sage grouse, black-backed woodpeckers, willow flycatchers, nesting golden eagles, badgers, abundant mule deer, and brook trout.

An as yet unpublished report from Trout Unlimited indicates that Dexter and Wet Canyons are a subset of drainages flowing northeast from the Bald-Glass transverse range that possess some of the highest aquatic integrity scores in the eastern Sierra region. We recommend the Forest Service determine the eligibility and suitability of Dexter and Wet Canyons in plan revision.

Black and Marble Canyons
Draining the southwest corner of the White Mountains, Black Canyon Creek and its tributary, Marble Canyon sustain locally abundant flows that support unique riparian systems. The dependable flows in these canyons also sustained Native Americans for hundreds of years. Because of this, the canyons are rich in Native American heritage. Marble Canyon is of particular interest as a deep, marble-walled canyon reminiscent of Death Valley canyons supporting a rich cottonwood-birch-cattail riparian corridor. We recommend the Forest Service determine the eligibility and suitability of Black and Marble Canyons in plan revision.

Birch Creek
Draining the southeast corner of the White Mountains, Birch Creek supports a lush riparian corridor at the boundary of the Mojave and Great Basin deserts. The creek's rich birch-cottonwood riparian forests host a recently discovered isolated population of Black Toad, a California Fully Protected Species. Upland vegetation includes a portion of the Ancient Bristlecone Pine Forest, extensive pinyon-juniper forest and transitional desert habitat from saltbrush scrub up through sagebrush steppe. We recommend the Forest Service determine the eligibility and suitability of Birch Creek in plan revision.

Middle Fork of the San Joaquin
The Middle Fork of the San Joaquin River originates at Thousand Island Lake in the high country of the Inyo and flows through the Devils Postpile National Monument

(DEPO). The river was determined eligible for inclusion into the National WSR system in 1991. The river is one of the few remaining completely free-flowing Sierra Nevada Rivers with minimal man-made intrusions. The River supports several threatened and endangered species, including Bald Eagle, Willow Flycatcher, Yosemite Toad and four species of bat. The DEPO Draft General Management Plan (DGMP) recommends the middle fork of the San Joaquin be added to the National WSR System. As outlined in the DGMP, segment one is 6 miles of wild classification, segment 3 is 2.5 miles of scenic classification and segment 4 is 9 miles of wild classification[3]. We recommend the Forest Service determine the eligibility and suitability of the middle fork of the San Joaquin in the plan revision and work with the DEPO to obtain WSR protection.

Alternative Designations

Our comments here mirror those we submitted during the Need for Change portion of the planning process. We do not agree that the condition and trend for other designated areas is moderate to good. The Planning Rule requires the Forest Service to assess the potential need and opportunity for additional designated areas, which then enables the Forest Service to designate additional areas as needed. The opportunity for establishing new designations is not addressed in the NOI or Proposed Action. The Forest Assessment (chapter 16, page 196) outlines several community types on the Inyo that hold unique geology and vegetation. These include aspen, sagebrush steppe, xeric shrublands, and carbonate areas. These ecologically unique core areas may benefit from various designations that will protect and help the Forest manage them responsibly. Recognizing the limited capacity of the USFS to assess areas for alternative designation, we will be conducting an analysis of areas suitable for special interest area administrative designation. We look forward to providing this information to the Forest Supervisor along with recommendations. Our early recommendations appear within the Wilderness Inventory and Evaluation section of this letter.

Interpretation and Education

This is a very important addition to the revised plan. The Inyo has an amazing opportunity to build its interpretative and educational programming. The existing interpretative trails such as Sotcher Lake and Nunatak nature trails are in extreme disrepair. The plan should utilize the existing interpretative partners working on the forest to achieve desired conditions written in the plan. We also hope to see the plan outline how the success of these programs will be measured. Plan components here need to allow the forest to track use and visitor impact through surveys, registers and other data collection methodologies. The decline in forest capacity to provide education and interpretation leads can be seen as an opportunity to collaborate with non-profits and other groups experienced in providing interpretation.

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[3] Devils Postpile Draft General Management Plan. August 2014. Department of Interior, National Park Service. Available at: http://parkplanning.nps.gov/document.cfm?parkID=296&projectID=26581&documentID=60642.

Wilderness Inventory/Evaluation Comments

General Comments
To many members of the public, the FS Wilderness Inventory and Evaluation process has appeared unnecessarily rushed, haphazard and pre-decisional. The notice to provide substantive comment on the evaluation portion of this important process was not provided in any discernable public way, but rather inserted sometime during the process on the FS webpage. The minimal comment window provided, combined with the somewhat cumbersome commenting tools (online layered maps that fail to work for many users and offline intermittently during the narrow comment window) and partial information provided has created unnecessary public confusion and difficulty.

Compounding the difficulty in commenting was the lack of any definitive naming system of identified polygons on any publicly available pdf maps. In addition to lacking any nomenclature, the maps were at so large a scale as to make site-specific commenting very difficult. The pdf maps lacked any names for roads, lakes, or underlying topographic or cultural features. We are unaware if there are names provided on the "Talking Points" tool, but regardless, when requesting public comment on a site-specific process such as Wilderness Inventory and Evaluation, the public needs to know how to refer to areas. To partially address this problem, we have utilized the original Forest Service Inventoried Roadless Area (IRA) names (ALL CAPS) when commenting.

The following comments were crafted utilizing the pdf maps available at the Regional Planning website (http://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=STELPRD3803608) downloaded on September 15th, 2014. We note that the maps displayed at the INF Plan revision open house in Bishop on the 18th of September showed radically different polygons and associated information. These maps were presented as "Evaluation" maps before the inventory comment period was even complete. The moving target character of this process has created unnecessary public confusion and animosity around an issue that definitely needs no more fuel for it's own long simmering fire.
Friends of the Inyo encourages to Forest Service to fully evaluate for Wilderness potential all of the areas discussed below following the mandate of the 2012 Planning Rule and utilizing the Forest's own evaluation rubric. Each of the areas below contains outstanding recreational, cultural, scenic and ecological values that, if located on any other Forest in the nation, would clearly be subject to thoughtful evaluation.

Values – mainly ecological and cultural values – for each specific area are described below. For each area, regardless of if a given area is recommended by the Forest for federal Wilderness designation, the values – such as diverse conifer assemblages, wildlife habitat, connectivity – described below must be sustainably managed by the

Forest. Both the evaluation and final planning documents should detail for each area how areas specific values and resources will be sustained.

Area Specific Comments

MOUNT OLSEN
Containing steep slopes of metamorphic ocean sediment along the northern wall of Lundy Canyon, the Mount Olsen area supports good forage and escape terrain for Endangered Sierra Nevada bighorn sheep. Sheep are often spotted here in winter where these south facing slopes melt off early. This polygon is contiguous with Hoover Wilderness on the west and the Hoover East Roadless Area on the north. The FS recommendation for inclusion in the evaluation is sound.

LOG CABIN-SADDLEBAG
Owing to much of it's land begin added to the Hoover Wilderness in the 2009 Omnibus Public Lands Bill, it is now broken into three remaining tag ends. Inclusion of the remaining western polygon (rising above the west shore of Mono Lake) and central polygon (west of Saddlebag Road) is sound. The central polygon contains a wild stretch of Upper Lee Vining Creek and supports abundant opportunities for diverse primitive recreation along with habitat for Yosemite Toads and Sierra Nevada Bighorn Sheep. As recommendations for this area evolve, the Forest should ensure that existing facilities, such as Tioga Pass Resort, the Nunatak Trail and Sawmill Walk-in campground are excluded with minor boundary adjustments.

HORSE MEADOWS
While we are saddened to see northeastern blob of this IRA excluded (the piece that includes Wilson Butte) we acknowledge that this section is divided from the main body of the IRA by a system road. The Horse Meadows IRA includes the transitional slope from the floor of the Mono Basin to the mid-slope boundary of the Ansel Adams Wilderness. Lands in this polygon support with mature, mixed conifer forests in Gibbs, Bloody and especially Sawmill canyons. Extensive, old-growth mixed conifer forest of this transitional zone is currently poorly represented in Wilderness on the Inyo National Forest. This mixed conifer zone is also unique for it's diversity and inclusion of relatively rare conifer species in this zone of the Inyo National Forest – namely healthy limber pines in Bloody Canyon. We strongly support the Forest's acknowledgement of the roadless character of the Parker Bench area south of the previously identified IRA. This southern section of the IRA includes extensive aspen groves, old-growth lodgepole forests and numerous isolated riparian systems. Of note, an isolated population of Southern Alligator Lizards (historically documented and recently rediscovered) exists in aspen groves along the Parker Bench trail (Inyo NFST 2603). Minor boundary modifications to the currently polygon would create a very manageable, defined eastern boundary for the Ansel Adams Wilderness. In particular, the Forest should exclude the currently unauthorized route up Bohler Canyon to a point in the center of Section 6 (edge of Upper Bohler Meadow) as this route, while unauthorized is currently being used and may be added to back to Inyo road system in the near future. Also, Forest Route

01S24 running up Sawmill Canyon is a closed road that has been restored, this expanded Horse Meadows IRA polygon should be extended to include the small orange polygon shown between 1s24 and 1s23 to create a contiguous finger of roadless to the eastern forest boundary. Additionally, the southeastern boundary of the polygon should follow the trace of the Parker Bench Trail from Rush Creek Trailhead up to Parker Bench to end of Parker Road 1s01 (Inyo NFST #2603 as southeastern boundary) with a 30' setback to the west; this trail is used by mountain bikes, as well Frontier Pack Station for commercial day rides. There are no known developments or other non-conforming features within this polygon, while the area definitely supports outstanding opportunities for exploration. Inclusion of Bloody Canyon west of the private lands of the Little Walker Lake Land Company, LLC would enhance protection for this scenic canyon that has supported the main route from Yosemite to the Mono Basin for hundreds, perhaps thousands, of years.

We support thoughtful evaluation of this polygon (with the adjustments described above), and believe this area should be recommended by the Forest for Wilderness protection.

EXCELSIOR

As visitors to this IRA know, the Excelsior IRA lives up to its name. An amazingly wild, untouched chunk of the western Great Basin, this IRA contains extensive pinyon-juniper woods, isolated ephemeral lakes, dune systems and locally limited but ecologically critical springs and associated riparian systems. When taken together with the contiguous IRAs on the Humboldt-Toiyabe National Forest east of the CA-NV line, this roadless complex contains over 200,000 acres of primeval public lands rich in Native American and settlement area history.

The Forest has potentially erred in its exclusion of many of the smaller polygons to the north and west of this large IRA. First the orange polygon on the northern tip is contiguous with the Excelsior East IRA to the east and should be included. Continuing south, the first polygon along the west is contiguous with the Excelsior Wilderness Study Area managed by the Bishop Field Office of the BLM. We cannot determine what justifies the excluded corridor cutting the southwestern corner of the southwestern most orange polygon.

The large orange polygon north of INF 01N13 is unjustifiably excluded from the Inventory. There are no known outstanding developments west of 1N43-1N113 and the eastern edge of this polygon to preclude inclusion within the evaluation. Additionally, this polygon contains unique dune systems, ephemeral lakes and is contiguous on the north with the large Huntoon IRA on the Humboldt-Toiyabe National Forest. Just east of the CA-NV border, the Inventory maps show an open polygon south of the mapped Huntoon IRA and the green INF boundary. This polygon is managed by the INF and is contiguous with the large orange polygon discussed above, as well as the Huntoon IRA. This empty hole should be filled with purple and included in the contiguous polygon to the south, west and east for the purposes of the evaluation.

The Excelsior area, especially when viewed at the landscape level with the adjacent IRAs in Nevada, present an excellent candidate for inclusion in the National Wilderness Preservation System.

MONO CRATERS

The Forest's inclusion of the wild, roadless northern portion north of the existing IRA is welcome and sound. The Mono Craters, a north-west string of volcanic craters, form one of the most unique and striking landforms in the Inyo National Forest. The national youngest stand-alone mountain range, the Mono Craters house an isolated population of pika, surprising conifer diversity, unique plants and outstanding exploration potential.

DEXTER CANYON

The Dexter Canyon IRA is perhaps the most geographically varied and ecologically rich IRA on the north zone of the Inyo National Forest. A landscape of rough hewn granite knobs, rolling uplands, and flat volcanic mesas deeply incised with steep-walled canyons reminiscent of the desert southwest, Dexter is unlike anywhere on the Forest. The western potion supports old-growth lodgepole and Jeffrey pine forests dotted with sedge/rush-dominated meadows (Crooked Meadow, Dead Horse Meadow, Sagehen Meadow Sentinel Meadow, Johnny Meadow) while the northern and eastern portion are defined by open sagebrush plains, extensive snowbank aspen groves and narrow riparian aspen filled canyons. Within the Dexter IRA, free-flowing North Canyon Creek, Dexter Canyon Creek, Wild Cow Creek and Wet Canyon Creeks support locally-limited but ecologically critical riparian habitat. Goshawk, greater sage grouse, black-backed woodpeckers, willow flycatchers and nesting golden eagles join badgers, abundant mule deer, and brook trout as wild citizens of this area.

The Dexter Canyon IRA supports abundant upland snowbank aspen groves. Isolated from any surface water source, these groves are distinct from riparian aspen. Extensive groves exist on northeast facing slopes east of Sagehen Peak and Dead Horse Meadow, as well as the walls of upper Dexter Canyon east of Crooked Meadows.

As to the inventory polygons, the northwestern portion of the original Dexter IRA appears to be excluded due to a north-south corridor. We are unaware of any existing development or right of way that exists in this location to justify this exclusion. Similarly, the southwestern corner of the IRA is shown as excluded west of a constriction between FS routes 01N02 on west and 01S17 on the east. The longitudinal distance between these two system routes is larger than a ½ mile. This constriction contains a set of two, parallel 500' deep canyons supporting a unique mix of confers and flowing streams (Dexter and Wet Canyon creeks); this constriction does not rise to level of justifying excluding this southwestern potion of the polygon. From the bottom of these canyons, one would be hard pressed to describe the surrounding aspen groves and sheer volcanic walls as anything but wilderness. This southwestern orange blob, as the wildest and wettest portion of the

Dexter Canyon Roadless Area, contains the Roadless Area's highest ecological value and outstanding opportunities for exploring an unexpected landscape unlike any other on the Inyo National Forest; it should be added back to the larger purple polygon for the purposes of this Wilderness evaluation.

We believe the Dexter Canyon area, with adjustments to exclude motorized system routes and INCLUDE the southwestern portion, presents a strong candidate for inclusion in the National Wilderness Preservation System and should be recommended as such by the Forest Service.

GLASS MOUNTAINS

Unique for the Eastern Sierra, the Glass Mountains IRA (expanded purple polygon running along east-west along the Glass Mountain ridgeline) form a transverse highland. Unlike most ranges in the Eastern Sierra, the Glass Mountains run east-west connecting the Sierra Nevada biogeographic province to the Great Basin. Inclusion of a portion of this large roadless landscape would fill a current Wilderness hole geographically, biologically and recreationally in the heart of the Inyo National Forest. At this polygon's core, the 2041 acre Sentinel Meadow RNA is already closed to motorized use and is surrounded by inaccessible, heavily forested sheer slopes to the north, south, east and west extending along the ridgeline around Bald Mountain to the Indiana Summit RNA. The current inventory map does not include motorized trails in this area. We support the current purple polygon and it's extensions with the note that minor boundary adjustments should be made to show FS motorized trails in the southern portion of this area. All polygons overlapping the original IRA should be evaluated as one complex for the purpose of this evaluation.

Of all the large, currently roadless, wild, non-wilderness landscapes on the Inyo National Forest, the varied ecological resources, cultural history and recreational diversity of the Glass Mountains beg for a special management under some designation, such as a National Conservation Area.

INDIANA SUMMIT FLATS

While not considered for Wilderness, this roadless sand flat shown as an orange polygon located in Sections 1, 2, 11 and 12 southwest of FS road 1S05 should be considered for an RNA as it is the largest unroaded pumice flat in the Glass Mountains. These "Dry-forb" or Mono pumice flats are unique to the Inyo and support local and rare plant species. Such unique meadow systems are abundant in the Glass Mountains, but no extensive example of this habitat is found in administrative or legislated protection, or representation within the RNA system. As with snowbank aspen, this ecosystem is likely to be dramatically effected by climate change. Research Natural Area designation would protect a uniquely Inyo National Forest ecosystem.

SAN JOAQUIN

While much of this Roadless Area was designated as the Owens River Headwaters Wilderness, the current inventory maps show red polygons along Minaret Summit

at the southwest, as well as along Dry Creek at the southern boundary. Both of these red polygons should be excluded from evaluation. While ecologically viable as Wilderness, the Minaret Summit polygon is riddled with ongoing snowmobile traffic and the southern polygon is separated from the Wilderness by a popular designated bike trail – the Mountain View Trail. We also support the Forest's exclusion of the pink polygons along the northern boundary of the Wilderness.

However, the Forest should include (and make contiguous) the pink polygon bounded on the west by the eastern boundary of the Wilderness between Glass and Deadman Creeks. This pink polygon should be merged with the orange polygon to the northeast to create a contiguous red polygon from the Wilderness boundary on the west to 02S11 on the north and 02s23A/02S49 on the southeast to the powerline excluding the motorized routes. This contiguous polygon includes old growth mixed conifer forest of Jeffrey pine, red fir, white fir, lodgepole pine and western white pine, as well as a unique pygmy grove of Jeffrey pine growing in poor pumice soils along 2S17.

WHITE MOUNTAINS

The remainders of this large IRA are shown on the current inventory map as three distinct complexes: 1) the purple polygons surrounding Boundary Peak and extending south to Leidy Creek, 2) the purple polygons at southwestern (north of Silver Canyon) and southeastern (north of Wyman Canyon) ends of the White Mountains RNA and 3) red and pink polygons south of White Mountain Peak and along the western Wilderness boundary. These will be discussed separately.

Boundary Peak polygons

Unlike the abrupt western escarpment of the White Mountains, the northeastern slope – east of Boundary Peak Wilderness and the CA-NV line – forms a gradual transitional zone from the alpine tundra along the crest down to through lodgepole, limber and bristlecone forest to mountain mahogany shrubland down sagebrush steppe out to saltbrush dominated lowlands. Evaluation of these polygons should consider that habitat does not recognize state boundaries. Protection of these transitional slopes would complete – from an ecological perspective – the conservation gains achieved through the designation of the existing White Mountain and Boundary Peak wilderness areas. We support the Forest's current purple polygon boundaries and encourage an evaluation of the areas east of Pinyon Mountain north to Queen Canyon as a single unit.

Southern Polygons

Just as the northeastern White Mountains Wilderness boundary follows an ecologically arbitrary stateline, the southern White Mountains Wilderness follows an equally arbitrary east-west county line. The large purple The purple polygon north of Silver Canyon should be redrawn to follow a more definable boundary – i.e. 75' north of the centerline of Silver Canyon Road (FS 6S02) east to the junction with the 'Old Silver Canyon Toll Road (FS trail #?) all the way to 75' east of the Ancient Bristlecone Pine Scenic Byway (6S01). This is basically the original IRA boundary.

The current straight line exclusion along this polygon's southern boundary appears arbitrary and does not follow the Forest's own guidelines for crafting evaluation boundaries as discussed in FSH 1909.12 Chapter 70 72.5. This area contains stands of bristlecone pine and provides habitat for desert bighorn sheep.

The southeastern purple polygon west of the Forest boundary and north of Wyman Canyon similarly should have its southern boundary modified to follow 75" north of the center line of Wyman Canyon Road or the powerline (whichever is farther north). This polygon contains granite and volcanic highlands with riparian areas such as Dead Horse Meadow, Crooked Creek and Black Birch Canyon. This polygon should be bounded on the west by Dead Horse Meadow Rd (35E301) and separated from the Blanco Mountain Roadless Area to the west.

We support recommending the southern portions of the White Mountain and Blanco Mountain IRAs between the current country line boundary south to Silver and Wyman Canyon Roads for inclusion in the Wilderness Preservation System.

Central and Western Polygons
We strongly support the Forest's inclusion of the red polygon running along the western edge of 4S01 west to the current Wilderness boundary with the caveat that the red polygon be excluded from consideration north of the White Mountain Trailhead at the boundary of Sections 32 and 33. This northern exclusion will ensure limited conflicts with the ongoing operations of the Barcroft laboratory. The southern portion includes the flanks of Paiute and Sheep mountains as well as the extensive alpine wetland complex between them.

We support the exclusion from review of the pink polygons in Montgomery Creek, Queen Dick, Pellsier to Birch Creeks, Jeffrey Mine Canyon, Milner Creek, and along the Moulas Mine Road (5S112). We also support the evaluation of the red polygon north of the Gunter Canyon Road as the current Wilderness boundary in this area could be modified to improve manageability.

BLANCO MOUNTAIN
As with the southern boundary of the Whites, the ecological continuity of the Blanco Mountain Roadless Area was severed by the east-west Inyo-Mono County line during the designation of the White Mountains Wilderness. Lands within the Blanco Mountain Roadless Area are currently included in the large purple polygon extending east from the Ancient Bristlecone Pine Scenic Byway to the eastern Forest Boundary. As discussed above, this polygon should be split in two by the Dead Horse Meadow Road (35E301); the western portion will then contain the Blanco Mountain Roadless Area. Blanco Mountain contains a scenically varied mix of granite hoodoos, open sagebrush steppe and limber-bristlecone forests. The western portion of this polygon also includes the congressionally designated Ancient Bristlecone Pine Forest. As discussed above, we encourage the Forest to recommend as Wilderness the remainder of the Blanco Mountain IRA south of the current county line Wilderness boundary.

BLACK CANYON
Located at the southwestern corner of the White Mountains, the Black Canyon Roadless Area contains abundant pinyon forests, scattered bristlecone and limber pines and unique riparian systems in Black Canyon Creek, Marble Canyon and Upper Redding Canyon. Owing to locally abundant water, the area houses many Native American cultural sites – from milling complexes to petroglyph panels. Marble Canyon is of particular interest as a deep, marble-walled canyon reminiscent of Death Valley canyons supporting a rich cottonwood-birch-cattail riparian corridor.

The current purple polygon should be modified to exclude the three main motorized trails through the area – Poleta to Black, Black Canyon to the spring and Black Canyon to the Bristlecone Road. Despite these exclusions this area should be evaluated for it's wild character as a complete complex made up of three units.

BIRCH CREEK
The ecological highpoint of the Birch Creek IRA is Birch Creek itself. A lush riparian corridor at the boundary of the Mojave and Great Basin deserts, Birch Creek's rich birch-cottonwood riparian forests host a recently discovered isolated population of Black Toad, a California Fully Protected Species. The Roadless Area also includes a portion of the Ancient Bristlecone Pine Forest, extensive pinyon-juniper forest and transitional desert habitat from saltbrush scrub up through sagebrush steppe.

The purple polygon should be slightly modified to exclude route 35E313 in the southwestern corner, but otherwise the boundaries are sound and defensible and contain no developments that could conflict with Wilderness designation. To reiterate this area contains outstanding ecological values that deserve special protection; interim management should be put in place for this spectacular area to ensure these values persist.

SOLDIER CANYON
Straddling the low gap between the highlands of the White Mountains to the north and the Inyo Mountains to the south, the Soldier Canyon IRA presents a unique designation opportunity to conserve both an east-west corridor for species moving from the Mojave to the Sierra, but also a north-south bridge connecting the Whites and Inyos. The current purple polygon should be modified to exclude designated motorized trails but evaluated for wilderness quality as a single unit including the red polygon in the southeastern corner contiguous with the Piper Mountains Wilderness. However, the red polygon should include the small pink polygon to the southeast.

Owing to this area's placement as a low bridge between the White and Inyo ranges and the Eureka-Deep Springs valley complex and the Owens Valley, some measure of site-specific management to protect this area should be put in place. One method to protect the ecological connectivity of this area is through a Zoological or Botanical Area designation.

PAIUTE & ANDREWS MOUNTAIN

The remainder of the Paiute IRA left out of the California Desert Protection Act of 1994 is shown as two distinct purple polygons on the current inventory map – the large polygon extending south from the Big Pine-Eureka Road to the Forest boundary and the northeastern most polygon bounded on the northeast by the Saline Valley Road. These two units are shown as connected to the Andrews Mountain IRA. These polygons contains an abundance of Native American cultural sites, as well as ecosystems ranging from sagebrush scrub up to pinyon-juniper woodland to bristlecone and limber pine forests. Geographically varied, ecologically rich and beautifully expansive, these polygons should be modified to exclude currently designated motorized routes but evaluated as a single unit along with the Andrews Mountain Roadless Area.

We support the inclusion of the red polygon surrounding the Bee and Willow Springs area with the note that route 36E401 and associated designated spurs be shown as a cherrystem. Cherrystemming this route does not affect the area's continuity with the existing Inyo Mountains Wilderness.

COYOTE NORTH & COYOTE SOUTHEAST

Taken together these two IRA's contain a unique alpine island removed from the Sierra crest. With alpine lakes, whitebark forests and expansive subalpine fell fields, the Coyote Plateau embodies the classic ideal of Wilderness. Currently numerous designated motorized routes divide the area. This evaluation should strongly evaluate the southern portions of the Coyote Southeast IRA (Green and Brown Lakes, the Hunchback east to Piper Peak) as contiguous with the existing John Muir Wilderness. Like the Glass Mountains, the Coyote Plateau requires some form of special management to preserve its abundant ecological, cultural and recreational values.

SOUTH SIERRA

Encompassing the transition zone from the Mojave Desert up to the Sierra, the South Sierra IRA contains two polygons – one on the east containing the steep Sierra escarpment and one on the west facing the Kern River and containing Monache Meadow. The eastern polygon would benefit from excluding a wider buffer around the Sage Flat area at the Olancha Trailhead. With this larger exclusion, the area contains outstanding scenic variety and ecological diversity (Joshua Trees, creosote bush and alpine Sierra) and lacks any known non-conforming structures. Boundary allowances should also be made around any developed private land in Long Canyon, as well as around developed facilities at the Kennedy Meadows Trailhead. This eastern polygon is contiguous with both the South Sierra Wilderness and the Sacatar Trail Wilderness.

The western polygon contains outstanding old growth forest along Kingfisher Ridge and outstanding scenic and recreational resources – all contiguous with the South Sierra and Golden Trout wilderness areas north of FS route 20S06.

The south sierra area – with the boundary changes discussed above – presents an outstanding and seemingly conflict free addition to the National Wilderness Preservation System.

Conclusion

Thank you for allowing us to be part of the Region 5 Early Adopter Forest Plan Revisions and accepting our suggestions and feedback along the way. We look forward to collaborating on the creation of a scientifically robust plan that has strong conservation language and balances opportunities for recreation and multiple use. We are optimistic this process can serve as a positive model for other Regions and Forests throughout the country. In the coming months we look forward to continuing to work with Forest staff through the DEIS. Please let me know if you have any questions about our comments or how we might be able to help with analysis or preparatory work as we move into the NEPA stage of planning.

Sincerely,

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