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BOARD OF SUPERVISORS COUNTY OF MONO

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Shannon Kendall, Clerk of the Board

October 2, 2018

Mr. Bernie Gyant
USDA Forest Service, Pacific Southwest Region
Objection Reviewing Officer
1323 Club Drive
Vallejo, CA 94592

Submitted via website comment form and email (objections-pacificsouthwest-regional-office@fs.fed.us)

RE: OBJECTION LETTER ON THE INYO NATIONAL FOREST PLAN REVISION

Responsible Official: Tammy Randall-Parker, Forest Supervisor, Inyo National Forest

Dear Mr. Bernie Gyant:

The Mono County Board of Supervisors appreciates the effort and dedication to revise the Inyo National Forest Plan and complete Final Environmental Impact Statement (FEIS). As approximately 65% of lands in Mono County are managed by the Inyo National Forest (INF), the well-being of the County and its residents are inextricably connected to and directly affected by forest management.

In keeping with the objection process, Mono County is only objecting where previous comments were not satisfactorily addressed in the revised Forest Plan. The County looks forward to meeting on these objections and objections of our stakeholders to finalize the Inyo National Forest Plan.

WILDERNESS and WILD & SCENIC RIVERS

Wilderness

Mono County generally supports the addition of wilderness areas in the county for a variety of reasons, from increasing opportunities for quiet recreation and solitude, to consistency with the County's "Wild by Nature" slogan, to addressing climate change impacts and species conservation.

Within Mono County's original comment letter on the Inyo National Forest Draft Plan and Environmental Impact Statement, a list of recommended wilderness areas was provided. The areas listed were included in Alternative C in some form and therefore meet wilderness criteria, however the areas have been excluded in the final report.

In Mono County comment 2107 of the FEIS, the rationale for excluding the requested areas from recommended wilderness includes 1) did not increase the manageability of adjacent wilderness areas as wilderness, 2) were not manageable as wilderness, or 3) did not add under-represented ecosystems to the National Preservation System.

To address points 1 and 3, Mono County submits that adding areas adjacent to existing wilderness and under-represented ecosystems has merit but that the actual wilderness characteristics of an area should be the determining factors. The Wilderness Act of 1964 specifically defines wilderness characteristics as: "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."¹

The Inyo National Forest, in determining the areas requested by Mono County should not be included as recommended wilderness, should explain, on the basis of the definition and criteria in the Wilderness Act of 1964, the rationale for exclusion. If no clear rationale exists, Mono County requests that these areas be included in as recommended wilderness. In addition, including these areas is only a recommendation. As pointed out in the response to comment 2104, only Congress can formally designate wilderness.

In response to point 2 above in the response to comment 2107, the rationale for determining these areas are not manageable as wilderness is unwarranted. The following bulleted points explain the flaws in commonly cited reasons offered by the Forest Service to exclude areas from wilderness, although the Inyo National Forest responses were not necessarily so specific:

1. Fish stocking - including non-native fish stocking - and fish barriers (Dexter Canyon)

- Congress has clarified that fisheries enhancement activities and facilities "are permissible and often highly desirable in wilderness areas Such activities and facilities include ... stream barriers, aerial stocking, and the protection and propagation of rare species." (House Report 95-540 of the Endangered American Wilderness Act)
- Fish barriers needed to protect endangered fish species are not precluded by wilderness. For example, there is a fish barrier that protects the threatened Paiute cutthroat trout on Cottonwood Creek, within the White Mountains Wilderness.
- To maintain an existing or construct a new fish barrier in wilderness would require a minimum tool analysis² (i.e. whether it is "necessary to meet minimum requirements for the administration of the area" under Sec. 4(c) of the Wilderness Act). Options could range from maintaining/constructing barriers by hand, using pack stock to carry equipment and supplies, to even constructing temporary motorized routes.

¹ The Wilderness Act of 1964. Section 2(c). <https://www.wilderness.net/nwps/legisact>. Site visited Sept. 22, 2018.

² Section 4(c) of the Wilderness Act provides that motorized equipment, mechanical transport, motorboats and aircraft landings are prohibited "...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act..." Proposed administrative activities must be evaluated via a minimum tool analysis to see if they are required. If so, then it is a "minimum requirement."

If it is not feasible to implement the "minimum requirement" without using generally prohibited activities (e.g. motorized equipment), then using motorized equipment becomes necessary and is the "minimum tool." Feasibility must be determined by physical possibilities not efficiency, convenience or cost. Each tool's proposed use must be evaluated on its own merits. A determination that a rock drill is "necessary" does not mean that it is acceptable to use a chainsaw or land a helicopter on the same project.

- Forest Service recommended wilderness areas in Alt. C generally exclude existing motorized routes and roads, so these routes are not targeted for closure and there should be little or no conflict with the need to maintain/construct fish barriers.
2. Wildlife management for species like bighorn sheep and sage grouse
- Congress has recognized that “management activities to maintain or restore wildlife populations and the habitats to support such populations may be carried out within wilderness areas ... where consistent with relevant wilderness management plans...” (Pub. L. 101-628 (Arizona Desert Wilderness Act); see also House Rep. 101-405 and Forest Service and BLM “Policies and Guidelines for Fish and Wildlife Management in Wilderness”)
 - Use of the minimum tool analysis should allow habitat restoration activities for these species without significant disturbance of wilderness qualities.
 - Recovery efforts for the at-risk Parker Meadow sage grouse sub-population in the Ansel Adams Northeast Addition -- which is threatened by pinyon/juniper encroachment, local development, power lines, and fencing -- could continue if the area were designated wilderness, subject to the minimum tool test.
3. Wildfire
- Section 4(d) of the Wilderness Act specifically allows firefighting in designated wilderness, stating that “such measures can be taken as may be necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable.” Congress has further provided that permitted fire control in wilderness areas “includes the use of mechanized equipment, the building of fire roads, fire towers or fire pre-suppression facilities where necessary and other techniques for fire control. In short, anything necessary for the protection of public health and safety is clearly permissible.” (House Report 95-540 of the Endangered American Wilderness Act)
 - National Park Service studies in the Illilouette Creek basin in Yosemite Park show that managed wildfire in wilderness provided reduced fire risk, greater resilience to fire and drought, greater vegetation diversity, and increased or stabilized water yields, without significant negative effects. (“Managed Wildfire Effects on Forest Resilience and Water in the Sierra Nevada” by Gabriel Boisrame et al, Ecosystems 2016)
 - Prescribed fire and associated fuel management may also occur in wilderness (for example, the Caples Creek Ecological Restoration Project, Eldorado National Forest, in the agency-recommended Caples Creek Wilderness).
4. Sights and Sounds
- The Wilderness Act does not preclude the designation of areas that are affected by external sights and sounds. In fact, there are and will continue to be wilderness areas designated by Congress right next to urban landscapes with plenty of sights and sounds.
 - The Inyo’s wilderness analysis inappropriately considers outside sights and sounds – often related to motorized activity on roads or trails outside the polygon. Outside sights and sounds are relevant to wilderness suitability only to the extent that they are “pervasive and influence a visitor’s opportunity for solitude” throughout the unit. (FSH 1909.12, sec. 72.1(2)(a). The Inyo Plan’s assertions that sights and sounds “would likely penetrate throughout much of the polygon” are unsupported by any empirical data, noise models, or surveys.
 - It is especially inappropriate to disqualify areas based on exterior sights or sounds associated with motorized use of the roads that necessarily define the areas’ boundaries or are cherry-stemmed. In fact, many designated wilderness areas are closely bordered by high-traffic roads. As Congress has seen fit to use these highways and other major thoroughfares as wilderness boundaries, the Forest Service cannot reasonably claim that the noise caused by lesser roads or even motorized trails can create a “pervasive” loss of wilderness values across large, rugged, and usually trackless landscapes.
 - Even where an area’s exterior sights and sounds are clearly pervasive and preventing opportunities for solitude, the area can still be suitable for wilderness recommendation if it possesses outstanding opportunities for primitive and unconfined recreation.

5. Wild Horse Management

- The management requirements of the Wild Free Roaming Horses and Burros Act are not inconsistent with the Wilderness Act. Under the Wild Horses law, management activities such as use of helicopters and motorized vehicles to manage wild horses "shall be at the minimal feasible level" (Sec. 1331); similarly, motorized uses are allowed in wilderness areas "as necessary to meet the minimum requirements for the administration of the area" (Wilderness Act, Sec. 4(c)).
- Thus, wild horse management activities, like other administrative uses of motorized vehicles, are permissible in wilderness areas, subject to the minimum tools test.

6. Evidence of past mining, grazing development, historical sites, etc.

- The Forest Service should not take an overly "purist" approach toward non-conforming past uses in making its wilderness recommendations. Section 2(c) of the Wilderness Act defines wilderness as an area that "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable" (emphasis added). Thus, areas need not be pristine or untouched to be suitable for wilderness designation, and an area may include any number of past or present activities or improvements, so long as they are substantially unnoticeable.
- Continued livestock grazing is specifically allowed by the Wilderness Act (Sec. 4(d)(4)). Grazing and associated infrastructure is commonplace throughout many designated and recommended wilderness areas in western national forests.

7. Lack of water (limiting recreation)

- The absence of water is not a valid reason not to recommend an area for wilderness. There are plenty of existing wilderness areas with little or no water (particularly, for example, in the California Desert).
- This non-criterion is inconsistently and arbitrarily applied in the plan. It states that the lack of water in the Glass Mountains supports a remote wilderness experience, while noting that lack of water limits recreation opportunities in Adobe Hills, South Huntoon Creek, and Pizona-Truman Meadows.

Mono County continues to request the following areas, most of which were included in Alternative C in some form and therefore meet wilderness criteria, be added to the final Plan as recommended wilderness. Specific boundaries should be identified at a later date as noted above, however general maps of these areas are attached³ to provide a geographic reference (see Attachment 1).

- Dexter Canyon: As proposed in Alternative C; see DEIS Appendix B, pages 34-36 for an evaluation of wilderness characteristics. Please note the attached map contains an area in the southwest that is not included in Alternative C, but includes geological, ecological, and recreational features that justify wilderness eligibility according to the Sierra Club. As stated previously, adjustments such as these to determine the final boundary should be the product of additional public outreach.
- Glass Mountains: A larger area (~34,500 acres) is proposed in Alternative C; the County supports a reduced area for wilderness of ~17,000 acres, similar to the areas submitted by the Sierra Club and Friends of the Inyo, to avoid recreation conflicts and potential conflicts due to management of Bi-State sage-grouse habitat. This more limited area was included in the DEIS Appendix B evaluation (pages 30-33).
- Ansel Adams Wilderness Addition – Northeast: As proposed in Alternative C, with the exclusion of Walker Lake; see DEIS Appendix B, pages 69-71. Walker Lake contains existing private property and recreation facilities, and therefore should not be included in the recommended wilderness. The Sierra Club has also suggested that an unauthorized route in Bohler Canyon should be excluded; this type of adjustment should be the product of additional public outreach.
- Adobe Hills: As proposed in Alternative C; see DEIS Appendix B, pages 104-105.

³ Maps provided courtesy of the Sierra Club.

- South Huntoon Creek: This area is missing from Table 118 in the DEIS Volume I (p. 517), which appears to be an error, as it is included in Table B-3 of DEIS Appendix B (p. 234). This error should be corrected. The Board would like South Huntoon Creek to be included in recommended wilderness as proposed in Alternative C, based on the evaluation of wilderness characteristics in DEIS Appendix B (p. 105-106).
- Huntoon Creek: As proposed in Alternative C; see DEIS Appendix B, pages 107-108.
- Pizona-Truman Meadows: Mono County is commenting only on the portion of this polygon within California. The Nevada portion is excluded from our comments. While the County is generally supportive of including this area in recommended wilderness as proposed in Alternative C, concerns about access and use by Native Americans in order to protect their heritage should be addressed. We request the INF conduct specific outreach to tribes on this parcel as part of the public outreach process to determine boundaries. See DEIS Appendix B, pages 101-102 for and evaluation of wilderness characteristics.

The inclusion of the areas above as recommended wilderness will resolve this objection. In addition, Mono County appreciates that, regardless of labels, it appears much of these lands are in the "Challenging Backroad Area (Low Use)."⁴ As noted in response to comment 2104, the standards and guidelines for these areas were designed to retain low use with undeveloped, natural landscapes and challenging access to retain a feel of wildness for forest users.

Wild & Scenic Rivers

Mono County continues to request the inclusion of the following waters on the Wild & Scenic River eligibility list based on Outstandingly Remarkable Values (ORVs, see attachment 2):

- Rush Creek, segment 1.28.1, unmapped 3.4-mile section, and segment 1.166: The segment from the outlet of Silver Lake to the inlet of Grant Lake should be considered eligible, as it is both scenic and a very popular recreational fishing area. These segments (1.28.1 and the unmapped 3.4 mile section between Mono Gate One Return to segment 1.166, and including segment 1.166) exhibit dense stands of aspens; a dramatic, narrow, glacially-carved stretch of canyon; and exceptional fall color displays. Segment 1.28.1 also includes views of Horsetail Falls, the largest waterfall in the region, unmentioned in the analysis. Recreational use is diverse with camping, fishing, hiking, photography, and fall color recreation focused on this stretch, which brings recreation visits from outside the Region of Comparison. Segment 1.166 is difficult to resolve on page 320 of the FEIS, "Inyo National Forest: Wild & Scenic River Evaluation Map A" and in the GIS mapping. As best we can surmise, this section includes the confluence of Walker Creek and the area known as the "Rush Creek Narrows." This small segment is contiguous with the values in the lower segment 1.28.2. The Narrows also include significant cultural Native American Kutzadika^a Paiute archaeological features, in addition to exceptionally scenic geologic features including rapids as Rush Creek erodes into an exposed deposit of Bishop Tuff. Previous extensive comments on Rush Creek regarding geologic and cultural ORV potential covered this very short segment and the FEIS analysis makes no mention of geologic or prehistory values. The segment from the bottom of the Mono Gate One Return Ditch to Mono Lake should be considered eligible, as it has been significantly restored due to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. More than 15 years of State Water Board-ordered restoration has transformed this reach from a barren creek into a vibrant, recovering riparian system. This segment was not analyzed for eligibility in the FEIS. The restoration of this segment and the historic background of this decision indicates ORV. The Mono Lake Public Trust Decision and the resultant decisions regarding Mono Lake and its tributary streams are notable in environmental law and history. *"The public trust...is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands..."* (Supreme Court of California, 1983). This landmark decision influenced other state public trust decisions and is an outstanding remarkable historical value that led to the restoration of this stream

⁴ Revised Land Management Plan, Inyo National Forest, Appendix A, Maps: Sustainable Recreation Management Areas. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589652.pdf. p. 135. Site Visited Sept. 22, 2018.

segment and others in the Mono Basin that were devastated by excessive water diversions beginning in 1941. The fact that this unmapped segment of Rush Creek flows outside of federal designation is not a reason for exclusion. FSH 1909.12_82.61.2 directs the agency to "Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values."

- Lee Vining Creek, segment 1.12.6: Previous comments indicated that this segment includes a substantial portion within the Congressionally-designated Mono Basin National Forest Scenic Area, and as a result of enabling legislation (1984 PL 98-425, section 301) management actions should be directed toward "protecting [the Scenic Area's] geological, ecological, cultural, scenic and other natural resources." Scenic values were recognized even prior to the restoration of stream flows in the riparian corridor 30 years ago. Today the segment offers incomparable views of Mono Lake with its volcanic islands, the Mono Craters, distinctive tufa towers at Lee Vining Tufa, and thousands of birds using the rich delta terminus. The broad riparian bottomland offers an extensive ribbon of green in summer and blaze of orange and yellow in fall, the richest source of fall color display anywhere along the Lee Vining Creek drainage. The area frames a spectacular view from the back patio of the Mono Basin National Forest Scenic Area Visitor Center, a view sought by over 100,000 visitors annually. No other creek within the Mono Basin currently offers a broad, riparian ecosystem experience leading to the shoreline of Mono Lake. This is a unique scenic experience indicative of an Outstandingly Remarkable Value (ORV). This segment also includes Lee Vining Creek Trail, and natural and political history interpretive features, and connects key recreation destinations. Previous comments noted that "this restored segment of Lee Vining Creek provides migratory wildlife habitat connectivity between Mono Lake and the high country as well as necessary riparian corridors in the arid Great Basin landscape." Because of this habitat value, this segment provides a unique recreational birding experience with the chance to see birds like Bullock's Orioles, Yellow Warblers, Osprey, California Gulls, Wilson's Phalaropes, Spotted Sandpipers, and Eared Grebes within ¼-mile of the lower segment. The lower segments near Mono Lake offer solitude, views of tufa towers, and excellent birding opportunities. This is a unique recreational experience within the Region of Comparison and is indicative of a recreational ORV. The County believes historic values were not fully evaluated and past comments were not considered: "This segment of Lee Vining Creek has undergone significant State Water Board-ordered restoration and habitat recovery as a result of Decision 1631." The restoration of this segment and the historic background of this decision indicates ORV. The Mono Lake Public Trust Decision and the resultant decisions regarding Mono Lake and its tributary streams are notable in environmental law and history. *"The public trust...is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands..."* (Supreme Court of California, 1983). This landmark decision has influenced other state public trust decisions and is an outstanding remarkable historical value that led to the restoration of this stream segment and others in the Mono Basin that were devastated by excessive water diversions beginning in 1941. This lower segment of Lee Vining Creek is free flowing, but the FEIS indicates no ORV. This is an arbitrary exclusion. Forest Service Handbook (FSH) 1909.12_82.61.2 directs the agency to "Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values." ORVs include scenic, recreational, wildlife and hydrologic transitions from diversions to restoration.
- Parker Creek, segment 1.25.2 and unmapped 3-mile segment: Segment 1.25.2 and the unmapped 3-mile segment to the Rush Creek confluence appears to have been excluded solely on the basis that it is not within wilderness, yet it is contiguous with segment 1.25.1. The scenic and recreational values do not abruptly end at the wilderness boundary. Previous comments recommended that this segment and the unmapped segment below this to the confluence with Rush Creek be eligible for scenic classification. The lower, unmapped segment of Parker Creek is now free flowing, and the historic diversion structure below segment 1.25.2 is a minor impoundment that as per 2013 settlement agreement with the Los Angeles Department of Water and Power will no longer divert water. This unmapped segment of Parker Creek was not analyzed for eligibility; it is roughly 3 miles in length, and per a State Water Board-approved settlement it is free-flowing. The fact that this portion flows outside of federal designation

is not a reason for exclusion. FSH 1909.12_82.61.2 directs the agency to "Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values." The County agrees that the unmapped section of Parker below 1.25.2 has ORV. Historic values were not fully evaluated, and past comments indicated, "hydrology history of diversions to free flowing, restored system." This segment of Walker Creek has undergone significant State Water Board-ordered restoration and habitat recovery as a result of Decision 1631." The restoration of this segment and the historic background of this decision indicates ORV. The Mono Lake Public Trust Decision and the resultant decisions regarding Mono Lake and its tributary streams are notable in environmental law and history. "*The public trust...is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands...*" (Supreme Court of California, 1983). This landmark decision influenced other state public trust decisions and is an outstanding remarkable historical value that led to the restoration of this stream segment and others in the Mono Basin that were devastated by excessive water diversions beginning in 1941. ORVs include scenic, fish and other values, and hydrologic diversion history to the current free-flowing, restored system. In addition, the INF should consult with LADWP on identifying segments flowing through its property as eligible.

- Walker Creek, segment 1.205.2 and the 2.9-mile unmapped segment to the confluence of Rush Creek: Segment 1.205.2 provides an intensely colorful display of aspen in the fall season that is highly scenic and distinctive for a large patch of aspen, surrounded by sagebrush-covered moraines and framed by 12-13,000-foot peaks. The area is an iconic fall color scenic location. ORVs include scenic, fish and other values, and hydrology diversion history to current free-flowing, restored system. In addition, the INF should consult with LADWP on identifying segments flowing through its property as eligible. The lower, unmapped segment of Walker Creek is free flowing, and the historic diversion structure below segment 1.205.2 is a minor impoundment that as per 2013 settlement agreement with the Los Angeles Department of Water and Power will no longer divert water. This unmapped segment of Walker Creek was not analyzed for eligibility; it is roughly 2.9 miles in length. The fact that this portion flows outside of federal designation is not a reason for exclusion. FSH 1909.12_82.61.2 directs the agency to "Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values." The unmapped section of Walker below 1.205.2 has ORV. Historic values were not fully evaluated and past comments indicated, "hydrology history of diversions to free flowing, restored system." This segment of Walker Creek has undergone significant State Water Board-ordered restoration and habitat recovery as a result of Decision 1631. The restoration of this segment and the historic background of this decision indicates ORV. The Mono Lake Public Trust Decision and the resultant decisions regarding Mono Lake and its tributary streams are notable in environmental law and history. "*The public trust...is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands...*" (Supreme Court of California, 1983). This landmark decision influenced other state public trust decisions and is an outstanding remarkable historical value that led to the restoration of this stream segment and others in the Mono Basin that were devastated by excessive water diversions beginning in 1941.
- Mill Creek, segments 1.18.5 – 1.18.12: The County supports including the segment from below US Highway 395 to Mono Lake on the list of eligible WSRs. However, the County's recommendation is conditioned on the inclusion of language within any eventual legislative designation that such designation shall not impact or impair historic water rights, uses of water, or activities on the Conway or Mattly ranches. The creek is noted for its scenic vistas of the Sierra crest, canyon walls, and Mono Lake, and recreation such as fishing, birding, hiking and photography is increasing. The segments, wholly or partially, transit the Congressionally-designated Mono Basin National Forest Scenic Area, and as a result of enabling legislation (1984 PL 98-425, section 301) management actions should be directed toward "protecting [the Scenic Area's] geological, ecological, cultural, scenic and other natural resources." A portion of this segment is within the Mono Basin National Forest Scenic Area and is therefore subject to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. Geological features, riparian songbird and waterfowl populations and habitat, and migratory bird habitat connectivity justify the eligibility of this stream reach. ORVs include scenic, recreational, geological and wildlife.

The omitted segments are worthy of inclusion because of their federal designation and their contiguous ORV to Mill Creek segment 1.18.12. Segment 1.18.12 exposes significant lake bottom, deltaic, and volcanic ash strata that are unique to the geologic history of the Mono Basin and reveal important data for constructing past lake levels and climate regimes in the Eastern Sierra and Great Basin. Adjacent to this value, the riparian corridor leading to a freshwater deltaic habitat entering a terminal saline lake is distinctive and rare in the Great Basin. The resulting delta has a high index of bird species and is critical waterfowl habitat in the Eastern Sierra, contributing to the greatest diversity and concentration of waterfowl species in the Mono Basin. As per FSH 1909.12_82.73a, "Wildlife values may be judged on the relative merits of either terrestrial or aquatic wildlife populations or habitat, or a combination of these conditions...The river, or area within the river corridor, provides uniquely diverse or high-quality habitat for wildlife of national or regional significance..."

- **Wilson Creek:** The County supports including the segment below the DeChambeau Ranch diversion on the list of eligible Wild and Scenic Rivers. The omitted segment is worth of inclusion because the segment exposes significant lake bottom, deltaic, and volcanic ash strata that are unique to the geologic history of the Mono Basin and reveal important data for constructing past lake levels and climate regimes in the Eastern Sierra and Great Basin. The segment is noted for its scenic vistas of the Sierra crest, canyon walls, and Mono Lake; recreational activities such as birding, hiking and photography; geological features, riparian songbird and waterfowl populations and habitat, and migratory bird habitat connectivity justify the eligibility of this stream reach. Adjacent to this value, the riparian corridor leading to a freshwater deltaic habitat entering a terminal saline lake is distinctive and rare in the Great Basin. The resulting delta has a high index of bird species and is critical waterfowl habitat in the Eastern Sierra, contribution to the greatest diversity and concentration of waterfowl species in the Mono Basin. As per FSH 1909.12-82.73a, "Wildlife values may be judged on the relative merits of either terrestrial or aquatic wildlife populations or habitat, or a combination of these conditions...The river, or area within the river corridor, provides uniquely diverse or high-quality habitat for wildlife of national or regional significance. The segment is within the Mono Basin National Forest Scenic Area and is therefore subject to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. The County's recommendation is conditioned on the inclusion of language within any eventual legislative designation that such designation shall not impact or impair historic water rights, uses of water, or activities on Conway or Mattly ranches. ORVs include scenic, reactional, geological, and wildlife.

Inclusion of the segments listed above as eligible Wild and Scenic River segments will resolve this objection.

Sustainable Recreation and Designated Areas

The County's concern with the FEIS summer and winter Recreation Opportunity Spectrum maps is the conflicting boundaries for motorized use. The Plan should provide rational as to why these boundaries differ. Changing the boundaries for a user group may have adverse effects on the environment and multiple recreational users of these areas during different times of the year.

Modifying the maps so that motorized use areas are the same in the winter and summer, or explaining the rationale for different boundaries, would resolve this objection.

CONCLUSION

Mono County appreciates the complexity of the Draft Plan and the effort it has taken to reach this point. We appreciate the outreach the INF has conducted by hosting workshops and attending meetings in Mono County during Plan development, and look forward to continued cooperation and increased partnerships in support of Forest Plan success.

If you have any questions regarding these comments, please contact Michael Draper in the Community Development Department at 760.924.1805 or mdraper@mono.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Gardner', written in a cursive style.

Bob Gardner

Chair, Mono County Board of Supervisors

Attachments:

1. Maps of recommended wilderness additions
2. Maps of Wild & Scenic River segments