



November 15, 2018

Deanna Dulen, Superintendent
Devils Postpile National Monument
P.O. Box 3999
Mammoth Lakes, CA 93546

Re: Devils Postpile National Monument Fire Management Plan

Dear Deanna:

Thank you for the opportunity to comment on the Environmental Assessment (EA) of the Devils Postpile National Monument (DEPO) Fire Management Plan. We support the EA's preferred alternative for the plan to align with the Inyo National Forest's final Land Management Plan and the proposed fire management zones of General Wildfire Protection, Wildfire Restoration, and Wildfire Maintenance. We appreciate the incorporation of fire use and natural ignitions in the new plan but believe they could be expanded across a larger area of the monument once fuels treatment projects have been implemented. The EA does a fine job of describing the best available science for fire frequency intervals across various vegetation types within the Monument. After a review of the EA's alternatives we support the following components of the preferred alternative and recommend small additions:

- We support the mitigation measure WLDF-2: Firefighter safety is priority, but whenever possible avoid cutting snags over 30 inches in diameter at breast height (dbh) and retain large woody debris for wildlife habitat. A lower dbh limit may be necessary in some ecosystem types and elevations where trees grow slower and the EA could further split dbh limits out by ecosystem type.
- Regular (following historical fire cycles) fire use is critical to maintain treatments that do require fuels reduction. There are several places the EA could describe this intent and purpose.
- The plan should promote public outreach of "living with fire" and accurately present the likely consequences of failure to reach fire regime-fire frequency, in an effort to shift the political tide regarding fire. The development of interpretive material regarding wildfire, prescribed fire, and fuels management activities for the public, NPS, and cooperating agencies is crucial but should also include workshops, public meetings and interagency meetings to better convey and coordinate information provided to the public.
- The plan should better describe the prescriptions used in meadows within the monument. The EA asserts that meadow burning would be on an experimental basis, but should also provide current science on meadow restoration with fire or give examples of experimental treatments and research.

We again thank the staff of Devils Postpile National Monument, the NPS Regional Planning Team, and the Inyo National Forest for working together to envision a comprehensive and scientifically driven plan for managing fire.

Sincerely,
/S/ Jora Fogg
Policy Director
Friends of the Inyo