



TO: Superintendent, Death Valley National Park  
Attn: Wilderness Plan Comments  
P.O. Box 579  
Death Valley, CA 92328

FROM: Drew Foster  
Conservation Associate  
Friends of the Inyo  
819 N Barlow Ln  
Bishop, CA 93514

RE: Death Valley National Park Wilderness and Backcountry Stewardship Plan and EA

Dear Superintendent,

Friends of the Inyo (FOI) is pleased to have the opportunity to comment on the recently released Death Valley National Park Wilderness and Backcountry Stewardship Plan and EA. We support the Park's Preferred Alternative (alternative D), which represents a reasonable mix of self-directed exploration and managed visitor experiences. FOI has had the wonderful opportunity to be able to partner with Death Valley (DEVA) doing stewardship activities for the past six or so years. These activities have included building and maintaining fences such as the exclusion fence at Hunter Mountain, maintaining trails, rehabilitating illegal off-road vehicle tracks and campsites, and cleaning up and maintaining existing campsites.

We feel that the "facilitation of volunteer stewardship activities" as described in the plan is extremely important, and would like to see this more heavily emphasized in the final proposal. Partnerships with volunteers, partner groups, and non-governmental organizations are invaluable in the services they provide which include maintenance, monitoring, education, and a sense of community service and stewardship for public lands.

Friends of the Inyo supports the Wilderness Restoration Criteria and Priorities as described in Appendix O. However, referring to the above paragraph, we would like to see more emphasis and encouragement of including partnerships and volunteer stewardship for both restoration efforts as well as public outreach when planning for site restoration management actions, when appropriate.

Friends of the Inyo supports the actions included in Appendix Q: Trails List and Trail Maintenance Standards, and is pleased to see, "...the Wilderness Coordinator may assist by recruiting youth labor crews or volunteers to perform trail maintenance insuring that trails are maintained at established standards..."



included on p. 367. With that mentioned, this is not meant to imply that FOI wants volunteer stewardship activity to replace or preclude any kind of agency led and funded labor and efforts. Quite to the contrary, we feel that the public land management agencies have a responsibility to preserve and improve the quality and experience of the land, especially with regards to Wilderness and the wilderness character. To be clear: when there is the opportunity for volunteer stewardship engagement, it is hoped that DEVA and the National Park Service encourages developing partnerships, utilizes existing partnerships, and engages volunteers where applicable.

Other items that Friends of the Inyo supports in the Plan include:

- Designated roadside camping corridors as outlined in the preferred alternative
- Wilderness and Backcountry Education Strategy as described in Appendix I; and it's hoped that there is a focus on it's implementation as outlined in the Timeline table on p. 298
- Encourage more monitoring for illegal off-road vehicle activity
- We would like to see an increased Ranger presence in the Wilderness and Backcountry areas
- Keep the wilderness character and opportunities for solitude that truly define the park intact
- Glad to see Appendix G: Wilderness Character Monitoring Strategy was developed with facilitation of both USFS and NPS staff. It is our hope that Wilderness Character Monitoring Strategies can become uniform and consistent throughout and across all the federal land management agencies that manage federally designated Wilderness Areas.

Something that is lacking in this plan, particularly in Appendix J: Commercial Use, is commercial aircraft overflights. In Appendix J: Table 1: Commercial Use limits in Wilderness, there is no mention of limiting commercial aircraft overflights. These overflights incur a serious detriment to the wilderness character, opportunities for solitude, and visitor experiences in the backcountry and Wilderness. While it is recognized that the Plan addresses this by referencing the Air Tour Management Plan in regards to commercial flights, and the largely unrestricted military overflights as legislated through the 1994 CA Desert Protection Act, this Plan and EA does not do enough to address the issue, particularly in regards to commercial overflights.

Again, Friends of the Inyo is glad to see this Plan moving forward and has the opportunity to comment. We hope to continue to be an engaged and helpful partner when it comes to the stewardship of the Wilderness and backcountry



areas of Death Valley National Park. FOI hopes to continue to stay informed on the process of this Plan, and other projects within DEVA.

Sincerely,

Drew Foster  
Conservation Associate  
Friends of the Inyo