

July 10, 2014

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Sent to: R5planrevision@fs.fed.us

RE: Draft Desired Conditions: Forest Plan Revisions, Region 5 Early Adopter Forests

Thank you for the opportunity to comment on the draft Desired Conditions (DCs) document for the Region 5 Early Adopter Forests. The DC was released well after the Need To Change document but the June 30th comment deadline remained the same. Please accept these comments on DCs that reflect a 30-day comment period.

With 28 years as the local leader for public lands conservation and stewardship in California's Eastern Sierra, Friends of the Inyo (FOI) has grown from a group of concerned citizens into a strategic non-profit with an active membership, Board of Directors, and partnership network. Since 2005, FOI has worked closely with the Inyo to implement stewardship and restoration projects on forest land. Friends of the Inyo has also engaged the public effectively throughout the management plan revision process. During the last two years, FOI has organized citizens and advocates of public lands, inspiring over 200 people to participate in the planning process. Our comments represent a broad based constituency. Because FOI focuses its work in the Eastern Sierra, we have limited our comments to address eastside DC's.

General Comments

The current Desired Conditions is a vast improvement on the original version. It is evident comments early on in the draft stages were incorporated into this new draft. For the most part these desired conditions follow the Forest Assessment and we appreciate the attention the region has paid to this. Several additions are still needed to strengthen Desired Conditions. There is inconsistency throughout the vegetation types with references to habitat for wildlife or other species. We have made notes where additions could be made, but in general each of these sections should contain a descriptive narrative of species that represent the DC. Desired Conditions should be written with as much quantitative language as possible and backed by the use of scientific indicators and standardized frameworks currently in use. New tools available from partners such as universities and non-governmental organizations should be integrated into new desired conditions. In some cases, regional or national standards may not be suitable for a specific DC or a specific forest. In these cases, the region should listen to the forest specialists who use more local landscape tools to scientifically assess a desired condition. Forest plan

revisions will need to balance regional expertise and standards with the ecological uniqueness and local knowledge set of each Forest. We hope the regional team will work closely and meet regularly with the extended team and additional forest specialists, as needed, during the entire plan revision process.

All Terrestrial Vegetation Types

Aspen

Riparian and snow bank aspens are genetically and morphologically unique. Snow bank aspens have different size class classification, hydrology and fire regimes. Both aspen types create habitat for a variety of cavity nesting species and migratory songbirds. Eastside Aspen DCs are particularly important as they comprise the majority of the hardwood forest community.

Eastside Vegetation Types

Sagebrush

1. Change to “Sage obligate species” such as...Sage Grouse, Sage Thrasher, Sage Sparrow
4. Add mycorrhizal soil crusts, as is present in Pinyon-juniper DCs
6. Please add a native perennial grass cover component. These grasses provide a food source, nest concealment and increase resistance to cheatgrass and other invasive species. Methods for achieving this DC include rest periods after fire, proper grazing management and post-project rehabilitation and restoration.

Pinyon-Juniper

1. Juniper Titmouse (*Baeolophus ridgwayi*) is now the name for titmouse occurring in PJ habitat, other important species include the woodhouseii subspecies of Scrub Jay and Long-eared Owl.
5. Juniper berries also provide foraging habitat for wildlife, mainly in the winter Native perennial grasses are also an important desired condition of Pinyon-juniper habitat.

Montane Jeffrey Pine

Areas that contain old growth components provide suitable habitat for American Marten, Northern Goshawk and other species of conservation concern.

Desert Shrub

Fire frequency in desert shrub has increased due to the presence of invasive species.

Dry Forb

Pumice sand flats in Mono County are impacted by recreational activities, especially off-road motorized use. Species composition of dry forb habitat is impacted by a warming climate. Endemics and rare species from the Forest Assessment should be listed here.

East Slope Black Oak and Canyon Live Oak

The extremely limited areas where this DC occurs on the Inyo should be noted. Protection of this habitat will be important to ensure it remains a part of the Inyo NF landscape's diversity.

Addition of Montane Shrubland or similar descriptive habitat

Since the Sagebrush DCs do not mention the presence of other co-dominant species, a DC for shrublands at mid elevations should be included. These shrublands include species such as bitterbrush, serviceberry, mountain mahogany and snowberry. Alternatively, sagebrush could include a co-dominant species composition DC.

Aquatic and Riparian Ecosystems

Water quality and quantity

Indices such as Index of Biological Integrity are used to determine the DC for water quality. Road and trail infrastructure are adequately maintained and restored to meet water quality objectives for biological, physical, and chemical integrity of aquatic systems.

4. Why does this only include Wild and Scenic River (WSR) segments? Watersheds outside of current and eligible WSR designation, and their associated rivers, streams and creeks are also vital to retaining water quality and often act as recharge areas.

Springs and Seeps

Harbor endemic aquatic invertebrate communities. Springs and seeps may need monitoring indicators that are different than those used for streams and riparian areas. Desired condition standards may be unique since the biota and water chemistry differ from that of most streams and riparian areas.

Desired Conditions of springs and seeps should include the presence of obligate endemic species such as Black Toad and Inyo Slender Salamander.

Multiple Uses

Timber

Given recent timber history, forest ecology and the recent assessment of suitable timber production on the Inyo NF, we strongly encourage separate desired conditions for the eastside. Timber on the Inyo has not provided forest products other than fuel wood in recent years. One example of an eastside DC would be: "Eastside timber provides firewood fuel to support local economic stability while contributing to forest health".

Recreation

Recreation opportunities

Forest "users" (perhaps a better word than visitors?) also find opportunities for solitude and primitive recreation in areas other than wilderness and recommended wilderness. Areas outside of such "designated areas" should provide recreational opportunities for all user groups across the Recreation Opportunity Spectrum.

Access

The transportation system is aligned within the Recreation Opportunity Spectrum.

Scenic Character

Scenic character is maintained and enhanced through Forest and partnership resources, facilities are placed where needed to protect the scenic character of a place.

Cultural Resources

Cultural resources provide opportunities for scientific research that enhance our understanding of cultural history and resources.

Designated Areas

Pacific Crest National Scenic Trail

The PCNST is monitored and managed to preserve and enhance the recreational and wilderness experience (96% of the trail is in wilderness) on the trail, either through wilderness staff or agency partnerships

Wilderness

As stated above, the resource condition of wilderness must contain language on wilderness presence (from USFS staff and/or volunteer rangers as needed) to manage it. Preservation and enhancement of wilderness happens through active management. Wilderness rangers, interpretive and scientific staff and trails crews are all aspects of desired conditions for Wilderness. Partnerships to achieve these desired conditions should be utilized.

Addition of other designations

Natural Research, Zoological and Botanical Areas, among others are managed for there assigned desired condition, linked to the rationale for the designation. Desired conditions may be different than Wilderness and WSR desired conditions.

Designated areas should preserve and maintain genetic diversity, including threatened, endangered, and sensitive species. Friends of the Inyo would like to recommend the assessment of additional designations (RNAs, Botanical or Geological Areas where appropriate) that fill gaps in current ecological representation on the Forest. The desired condition language should include a network of these areas that represent the full diversity of ecosystems found across the Inyo NF and whose size and number sufficiently represent the ecological features to be researched and are resilient to natural disturbances, climate change, and other stressors. Desired conditions are also missing a piece for Recreational and Scenic area designations to enhance management and access opportunities to popular recreation zones, improving the user experience and resource conditions.

Wilderness Inventory

Thank you for posting the Wilderness inventory maps and allowing the public to engage in the Wilderness process early on. We appreciate the opportunity to comment on these maps here. Unfortunately there are several important pieces missing from these maps. We can assume these issues will be addressed during Evaluation, but would like to bring them to the Region's attention. The preliminary inventory lacks all Ridgecrest and Bishop Field office Wilderness Study Areas (WSA) as well as the newly designated Granite Mountain Wilderness east of Mono Lake. These designated areas have been found to contain wilderness character significant enough to be managed for non-impairment until acted upon by Congress. Many

WSA's are contiguous with National Forest Inventoried Roadless Areas (IRAs). It may be helpful to further explain the designation of some areas as "excluded from inventory" on the map legend. It is unclear why some sections of IRAs are shown as "excluded" when conditions on the ground, as well as data from the map itself, show otherwise.

Once again, thank you for allowing us to be part of the Region 5 Early Adopter Forest Plan Revisions. 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 will serve as a model for other Regions and Forests throughout the country. Friends of the Inyo looks forward to many more years of partnership and collaboration with the Inyo National Forest and Region 5.

Sincerely,

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