



April 22, 2016

Scott Kusumoto – IDT Leader
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Re: Three Creeks Jeffrey Pine Forest Health and Restoration Environmental Assessment

We appreciate the opportunity to comment on the Three Creeks Jeffrey Pine Forest Health and Restoration (JPFH&R) Project Environmental Assessment (EA). As noted in the EA, Friends of the Inyo submitted comments during scoping in November of 2012. We continue to fully support the use of prescribed fire in conjunction with fuels treatments and pile burning, but would like to reiterate our concerns during scoping.

Notably absent from the EA is a review of the outcomes of previous treatments authorized after the 2007 EA. A proper place for this review would be the background section after the fifth paragraph and further discussion on page 13. Because Jeffrey Pine fuels work has been happening for the last eight years, the next phase of treatments is the ideal time to incorporate adaptive management principles. Additionally, monitoring data should be available to the public for review, either on the agency's proposed action webpage or as an appendix to the EA.

The necessity for fuels reduction is understood in the Wildland-Urban Intermix (WUI) zones, however the WUI is currently being redefined for Plan Revision for the Early Adopter Forests in Region 5. New wildfire zones will be Community, General, Restoration and Maintenance zones. Friends of the Inyo encourages the Forest to incorporate the new fire management zones proposed in the preferred alternative of the DEIS to be released next month. The bulk of implementation of this project will occur after the Record of Decision for the new Forest Plan (the JPFH&R EA states the project will last 8-10 years). Pages 7, 8, 11 all need updating to acknowledge Plan Revision changes.

Additionally, we support fire use from natural ignitions to meet targets during prescribed fire phases of this project. Project units that occur outside of the Community Wildlife Protection Zone (previously WUI), including the General, Restoration and Maintenance zones (see page 53 of the NOI proposed action, August 2014) have different management prescriptions and promote the use of natural ignitions to meet

prescription targets. We recommend the EA address these unit specific differences and highlight management direction for natural ignitions.

The EA does not adequately address route construction, the risk of proliferation and the need for immediate restoration and post-treatment monitoring. We understand the need for flexibility to determine when road restoration can begin because of prescribed fire operations and weather conditions, however NEPA analysis should always include programmatic authorization and a timetable for road restoration. Historically, funds for road restoration from fuels work have come from OHV green sticker funds and we implore the Forest to explore opportunities to build funds for this work into fire use and fuels project budgets. The EA should also contain a proposed monitoring plan for restored routes as an appendix.

We appreciate the discussion of retaining legacy trees and protocols for protecting these remaining trees from ladder fuels and high intensity fire. We also support a standard of retaining trees over 30 dbh, however what deems them a direct safety hazard needs to be defined more clearly. “Relatively few trees over 24 dbh are expected to be thinned” also needs clarification (pg 14). Our field visits to completed fuels projects show stumps over 30 dbh, that were not in fact hazard trees (not near roads, trails, campsites, etc). In addition, snags are sometimes cut regardless of snag retention management direction. We support the wildlife design features to create and recruit snags throughout each treatment area. Retaining and recruiting more than three snags per acre, as well as down logs, may be feasible in some units and should be assessed on a case-by-case basis. We recommend revising this language to “a minimum of 3 snags/ [5] downed logs” (pgs 18,34). We noted for downed logs, page 18 states up to 3 logs and page 34 states up to 5. Perhaps up to 5 logs is just for units that contain Goshawk habitat? Regardless the statements create some confusion over how many down logs will be created across units. The Forest should be particularly interested in creating wildlife habitat for Forest Sensitive Species such as Marten, Black-backed Woodpecker and Northern Goshawk, as a secondary target to improving Jeffrey Pine forest health.

Other comments

- Mitigation Measures (pg 27)- Forest resource specialists should be further explained. Titles may be appropriate to list here or linked to interdisciplinary team members on page 56.
- Wildlife Habitat Resources (pg 32)- Goshawk surveys are needed between 2014-2016 prior to implementation. Relying on surveys conducted between 2011-2013 is inadequate for determining presence of this species.
- Migratory Birds (35-36)- Black-backed woodpeckers are not generally viewed as a migratory species and the fourth paragraph fits into Wildlife Habitat Resources. Post-treatment units should be monitored by the Institute for Bird Populations

(IBP) or a similar contract to determine degree of habitat created for Black-backed woodpeckers.

- Range (pg 46)- The EA should contain a standard to prohibit grazing entry for three years following prescribed fire to prevent soil loss and allow shrubs, forbs and native perennial grasses to reestablish. This will also help limit the spread of cheatgrass and other invasive species. At a minimum “...areas treated with broadcast burning would be rested for two years afterwards” should be revised to three years. The soils section on page 43 should also contain impacts to soil from grazing if the area is not rested. Grazing is a secondary effect to soils following prescribed burning.
- Aquatic Macroinvertebrates (pg 36-37)- Streams should be monitored for temperature and other physical and biotic attributes following prescriptions. “...warming of the water in the stream will most likely not be measureable due to the retention of riparian vegetation...” is an inadequate effects analysis. The paragraph should include which units are riparian (0330007 and 0330009) and how they will be monitored after treatment to assess stream condition.
- Response to Comments 4-3 (pg 71)- We understand roads surrounding the Indiana Summit Research Natural Area create some fragmentation, but believe our scoping comments were misinterpreted. Fuels treatment creates additional fragmentation that enhances fragmentation effects. One method for minimizing this effect is to include a feathered buffer around the RNA as a separate design feature to these units. Feathered buffers will protect trees around the RNA and limit the possibility of catastrophic fire within the RNA, until the RNA itself can be treated by special management prescription.

Thank you again for the opportunity to comment on the JPFH&R Environmental Assessment and please let us know if Friends of the Inyo can be of assistance with any phases of this project.

Sincerely,

s/s Jora Fogg
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