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RE: Draft Need To Change: Forest Plan Revisions, Region 5 Early Adopter Forests

Thank you for the opportunity to comment on the Need To Change (NTC) draft document for the Region 5 Early Adopter Forests. Friends of the Inyo thanks you for the extension of the overall timeline, particularly in regards to putting together the NTC. The supplement for the NTC, Desired Conditions, and Wilderness Inventory were all released after the NTC but new comment deadlines were not communicated. Please consider assigning a 30-day comment period from each document's release date. Thank you for expanding the scope and scale of the emphasis areas in the Need for Change, to include other topics such as At Risk Species, Designated Areas, Roads and Infrastructure, Cultural and Historic Resources, and other themes as they relate to the 15 topic papers in the Assessments. In general the NTC is a vast improvement on the original draft, however there are several areas where additions, more detailed wording, and definitions of terms are needed. This plan revision process under the new planning rule will set the standard for all other forests going through future revisions. Through public input and active collaboration the early adopter forests will be able to write stronger Desired Conditions and Objectives, which will result in better Alternatives during the Draft and Final EIS process.

General Comments

The NTC has multiple references to restoration and monitoring. However, these terms are not clearly defined anywhere in the document. Monitoring and Adaptive Management should be identified throughout each of these areas, including development of standards, guidelines, and protocols across the region for partners and staff to help accomplish the monitoring that is central to informing planning and management and assessing whether desired conditions are achieved. The forest must continually monitor over time, and adapt management prescriptions at the project level as necessary. This will require additional capacity. Addressing the lack of staff capacity will be imperative to achieving the changes outlined in the NTC document. In its current form, the NTC does not adequately assess the capacity issues facing the Forest Service. Plan-wide the NTC should not only include "Incorporating strategies that prioritize partnerships with tribes", but also agencies, NGO's and other organizations that can offer expertise and guidance with programs and projects. Such groups can also provide support, training and funding for Forest Service staff to facilitate consistent and regular monitoring of resource conditions.

Ecological Integrity of Terrestrial Ecosystems

Overall

“Add plan strategies that emphasize large landscape restoration, including emphasis on cost effective stewardship contracts to improve implementation likelihood”: Please include other types of cost effective contracts as well, such as research and monitoring, as well as partnerships. Many partners regularly work with the Forest Service without incurring any Forest expenses. The Forest should recognize the value these partners bring, and improve effectiveness of partner efforts through internal efforts at training in working with partners, prioritization of working with and capitalizing partner efforts, and partnership coordination. This section emphasizes the need for restoration multiple times. Please expand upon the type of restoration with definitions and follow up each with a monitoring component.

Eastside

Thank you for acknowledging the challenge of Cheatgrass invasion on the eastside, and building new science and adaptive management strategies into plan components. Additionally, we appreciate the additions of Desired Conditions and plan components for ecological integrity of eastside ecosystems. Please name and define these ecosystems and eastside communities using the Forest Assessment. Please also include Canyon Live Oak/Black Oak, found in small patches along the southern Sierra Escarpment. Renewable Energy development has proven to be a topic of major planning importance and some concern in the Eastern Sierra in recent years, and the Forest will likely have some small or large role in its placement over the next 10-15 years. At the very least, the NTC should acknowledge the potential for renewable development in the future, including infrastructure, such as transmission lines, and potential effects on regional wildlife, groundwater resources and WUI.

Subalpine and Alpine

These communities are extremely fragile on the eastside and are among the most loved places, receiving heavy use with potentially lasting impacts. This damage is exacerbated by a recent chronic lack of Forest Service presence in these areas. Although the NTC acknowledges concentrated recreational use in these areas, recreational monitoring is absent and visitor use data is inaccurate (also see our comments in the Wilderness section of this letter). Additionally, subalpine and alpine meadows need a separate discussion in this section. Finally, this section is also lacking a discussion of White Bark Pine stands on the eastside. This community is under threat from Mountain Pine Beetle infestation. Several areas of the forest are undergoing an age class conversion as the beetles target older trees and thrive from a warming climate. Plan components need to include careful management of White Bark stands that enable natural processes to run their course, while cost-intensive and potentially counter-productive measures such as logging or aerial spraying management methods. Adaptive management, collaborative work with other Forests, new science and monitoring will all be essential to ensuring the continued ecological integrity of White Bank Pine habitats.

Old Forest and Complex Early Seral Habitats

Thank you for adding desired conditions for post-fire monitoring. Updating desired conditions to address old forest components and function is a good start, but addressing all seral stages is equally important. Fundamentally, this section needs to be separated into westside and eastside subsections in order to appropriately cover Great Basin habitats found on the Inyo (i.e. dry forb meadows, sagebrush, pinyon-juniper woodland).

Ecological Integrity of Aquatic and Riparian Ecosystems

In addition to prioritizing restoration of these ecosystems (again this needs contextual definition), the role of user impacts and roads along riparian areas need to be acknowledged here. Riparian areas are an important area for dispersed recreation but need to be managed appropriately to avoid over use and degradation. Partnership capacity can help the forest achieve desired conditions for riparian areas. Riparian aspen grove decline is addressed in the Meadows Emphasis Area of the forest assessment, but because the NTC lacks a meadows section, aspen decline should be included here, as many of the same threats exist to aspen groves in aquatic and riparian areas. Please include prioritizing interagency collaboration and partnerships in order to achieve goals of ecological integrity. Aquatic and riparian areas have some of the highest agency overlap on the eastside, including the EPA, State of California, BLM, USGS, USFWS, Los Angeles Department of Water and Power, and other utilities. Interagency programs may help increase opportunities to identify and reduce impacts, improve and increase monitoring, and increase restoration efforts. Finally, we would like to see a reference to the Watershed Condition Framework here. Priority Watersheds previously identified under this framework will require restoration work and monitoring.

Water

Plan components need to simultaneously restore degraded water quality locations and maintain areas with high water quality as identified through regular monitoring. Implementation of water quality monitoring is often made possible through citizen science partnerships and use of data collected by programs of the State Water Resources Control Board. Monitoring components should include defining ecological indices for condition assessments, as well as chemical standards. Several creeks and streams that are functioning at-risk are located in wilderness and roadless areas. We need to identify why these headwater areas are at-risk and the individual causes. Implementing USFS presence at high visitor use areas may be one tool to reverse water quality issues in these areas. The 13 watersheds identified as Functioning at Risk require site-specific management, including post-restoration monitoring to verify if restoration actions are actually working. Cost effective partnerships will increase the likelihood of implementation and follow through. From an economic perspective, Mammoth Creek and South Fork of the Kern River have fisheries to sustain. Meadows need a mention in this section as well. Thank you for addressing water shortage and drought conditions. This will need specific attention in the plan. This section may benefit from a westside/eastside split to highlight the ecological differences in water resources.

Meadows- recommended addition for Need to Change

Meadows are described in detail in the forest assessment. Meadows play an important role in water distribution, storage and filtration in the Sierra Nevada. Meadows health is declining on the eastside due to a variety of factors including drought, grazing regimes, modified hydrologic function, invasive species, incision, water withdrawal and fire suppression. Aspen groves within meadows have declined significantly for similar reasons, in addition to conifer encroachment. Aspen and meadow mosaics provide important habitat for many migratory bird species that are undergoing serious declines. The successful restoration of Forest Service meadows will only occur through a collaborative approach built on scientific monitoring foundation. There may be a need to change grazing management to support functioning meadows (timing of year and length of grazing time are key factors). We encourage range staff to maintain permitting requirements and carefully review any new grazing allotments on a site-specific basis. Meadows contribute to ecological resilience to climate change through storage and slow releases of cool water discharges through dry periods.

Air

Thank you for addressing the smoke tradeoff analysis, but this needs to be expanded to include active educational efforts to inform the public about fire on the landscape and its importance. There is a good deal of misinformation about air quality and wildfire on the eastside. The necessity of landscape level controlled fire to safeguard communities and habitat from devastating wildfire events needs to be emphasized as part of the Public Information procedures.

Invasive Species

Thank you for incorporating language on Cheatgrass and making sure eastside specific invasives get attention in the 3-Forest EIS. Given the depth and breadth of the problem, the forest should create a Cheatgrass management plan. Strong plan components will include post-treatment plans and post-project monitoring that would be incorporated in every Forest action. Cheatgrass rapidly invades disturbed areas, so all approved project work done, particularly when looking at restoration activities, mechanical treatment, logging, road construction, livestock grazing, and other development, should require and fund post-project management strategies. Developing cost-recovery strategies will allow the proponent of the project to be responsible for the cost of invasive species management. It should be noted that use of non-native mulching as a restoration prescription is known to spread invasive species. Care should be taken to identify all the potential sources of invasive species introduction to the landscape.

Fire

Below are bulleted recommendations on additions to this section. Some of these comments are also covered in other sections:

- Engage and educate the public about fire on the landscape and its importance. There is a wide lack of understanding among the public about fire. Communicate the necessity of landscape level controlled fire in order to safeguard communities and habitats from devastating wildfire events (also noted above in Air section).

- Add specific language to prohibit salvage logging, except in the case of specifically identified safety hazards, after fire. Backed by new science on fire ecology, plantation style restoration should be prohibited on the Inyo.
- Return fire to the landscape using a variety of techniques guided by new fire ecology science and research
- Ensure appropriate management actions after wildfire, including prescribed grazing rest periods to allow for landscape recovery and restoration actions where needed (site specific)
- All fuels, vegetation management and contract timber projects must incorporate a post-project monitoring program into project planning and approval processes with funding for monitoring methodologies identified in the planning and approval documents.
- Plan components should include retention of burned trees for wildlife and other ecosystem objectives.
- Non-native mulching after fire as a prescription for erosion control often leads to the spread of invasive species. Native mulching should be encouraged in plan components.
- Fuels projects including timber contracts need to include directives for cost-recovery to ensure timely restoration of project related roads, skids and landings and rehabilitate impacted areas
- Create Wilderness-specific directives for wildfire.
- Minimize impacts to and restore recreational resources and facilities after fuels treatment work, contract timber projects, prescribed fire and wildfire events.
- Many Wildland Urban Interface (WUI) zones on the Inyo tend to be very large, and even inappropriate in some cases. Thank you for including an assessment of WUI zones in plan components. Each zone should be clearly identified and evaluated using adaptive management techniques.

At-Risk Species

The Inyo has 92 species at risk. The revised plan needs to outline how the forest will identify threats and reverse species declines by addressing these threats. Although owls, fishers and listed amphibians need direct attention in plan components, the other species need strong protections written into plan revisions. One method for accomplishing this is by shifting management to communities of species. These are assemblages of plants and animals linked to a particular habitat. This methodology allows for recovery of at-risk species while also keeping common species common. One example of this is the importance of aspen and other hardwood forest communities to migratory bird species, many of which are in steep decline. These habitats provide stop over sites during migrations for some species, migratory corridors, and breeding habitat for other neotropical migrants. Please add the DPS of the Bi-state Sage Grouse to this section. The plan should use the 2012 Bi-State Action Plan¹ as a guiding document for improving

¹Available at:

http://www.ndow.org/uploadedFiles/ndoworg/Content/public_documents/Nevada_Wildlife/Bi-State%20Action%20Plan.pdf

ecological conditions for Sage Grouse. This section also needs to include plan components for management objectives under the Bighorn Sheep Recovery Plan². Again, partnerships and citizen science based programs should be utilized to increase forest service capacity to monitor Protected Activity Areas and other areas of critical habitat. Fisheries are an integral part of the eastside economy and the bulk of recreational fishing occurs on Forest Service land. Please prioritize responsible management of fisheries to support other native species, such as frogs and toads. This includes restoring native fish populations where appropriate.

Range

Please ensure management actions after fire contain a prescribed rest period for post-fire recovery. Range management on the eastside is overdue for a updated range infrastructure inventory, including but not limited to: active and abandoned fencing and water facilities, as well as artificial water sources constructed for game enhancement. Due to range staff capacity, implementation of this could occur through partnerships with local organizations. This section also needs to identify specific Great Basin range management components, as these differ greatly from westside rangelands.

Timber

Timber extraction on the eastside is management driven. Fuels reduction, conifer encroachment, beetle kill or hazard trees, salvage logging and habitat restoration are some of the topics that need to be individually addressed in the timber section. Friends of the Inyo would like to see this section include language specific to more xeric eastern Sierra forest types to facilitate sustainable and holistic management of these unique forest ecosystems. Additionally, Forest resources and timber contractors utilized for various projects must be required to perform timely restoration of roads and vegetation impacted by their operations. Project plans and individual timber contracts should contain a cost-recovery strategy for restoration of these project areas. The timber suitability map presented at the Bishop public workshop should include insets on the major areas so the public can more readily assess these areas and see timber suitability boundaries. From the scale presented, it appears that areas in designated Wilderness, Roadless Areas and Research Natural Areas were included while areas with long-standing active timber management were excluded on this map.

Recreation

The Inyo is a recreational forest. We need to acknowledge the economic value recreation has on the Inyo. Clearly defined Desired Conditions and Objectives need to be set for each individual Forest for sustainable recreation, including dispersed and developed recreation activities and uses. Areas that are well loved and experience high use should have local revenue allocated to manage the recreation resource in a sustainable way. Designations such as Scenic and Recreational areas may attract funding for such management. Many high use areas on the INF are in desperate need of recreational resources such as bear boxes, trash receptacles, toilets and kiosks with maps and forest information. Both the

² Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27634&inline=true>

Inyo and the public will benefit from revisions of the current concessionaire structure. Working with partners, local agencies, and organizations can enhance the recreational experience and build capacity. The agency should use partnerships strategically to address capacity constraints, while also recognizing that many partners and non-governmental organizations rely on increasingly limited and strained philanthropy and grant opportunities. Recreational plan components need to include guidance on special uses in Ski Areas and other recreational business providers under permit from the Inyo.

Cultural Resources

Please also include the utilization of partnerships to protect cultural and historically significant areas and provide feasible opportunities for responsible research to occur in these areas. If capacity is an issue for providing researchers with permits, this should be addressed in later plan components, as it is not restricted to one area of research but become frustratingly common across all scientific disciplines.

Wilderness

Wilderness-specific Management Plans are lacking for the Boundary Peak, Inyo Mountains, Owens River Headwaters, and White Mountains wilderness areas. These separate wilderness areas have unique ecological and geographical elements and need require area-specific management direction beyond what is provided in the Inyo NF LRMP. The Inyo needs to have wilderness rangers brought back on staff. The western portion of the INF sees extremely high wilderness use. The current permitting system is not an adequate tool for determining user data, or the impact these users have to sensitive alpine habitats. Most users know there is no wilderness presence or backcountry law enforcement, so they do not obtain the necessary permits. There are many who feel active management of Wilderness use on the Inyo has been abandoned. Although a small percentage of Wilderness Area on the Inyo has burned since 1944, recent fires have burned with high severity. With climate change and fire dynamics changing, the new plan should include Wilderness-specific directives for wildfire.

Wild and Scenic Rivers (WSR)

River Management Plans (CRMPs) are needed for the two recently designated W&Rs, Cottonwood Creek in the White Mountains and Owens River Headwaters. There is no current assessment of upland ecosystem conditions in the Owens River Headwaters W&SR, nor have Outstanding Remarkable Values been identified for segments here. Plan documents containing water quality conditions should have indices, which are developed and defined in the plan. Language such as “free flow” also needs definition. Multiple grazing allotments within WSR corridors contain meadows within these allotments that are rated as “Functional at Risk.” Grazing needs to be sustainably managed using current scientific information on the effects of grazing in such areas. Friends of the Inyo has several recommendations for Wild and Scenic River additions. These will be presented in future comments.

Pacific Crest National Scenic Trail (PCNST)

As previously mentioned, the Inyo portion of wilderness, including that along the PCNST, needs wilderness and trails staffing. Presence and management along the trail corridor will be vital to achieve the desired conditions of recreation experience and visual resources.

Other Designations (part of SECTION 3)

During the Forest Assessment planning process, Friends of the Inyo provided recommendations for wilderness and other designations. These comments are summarized below. We are not able to fully agree that the condition and trend for other designated areas is moderate to good. The Forest Assessment (chapter 16, page 196) outlines several community types on the Inyo that hold unique geology and vegetation. These include aspen, sagebrush steppe, xeric shrublands and carbonate areas. These ecologically unique core areas may benefit from various designations that will protect and help the Forest manage these areas responsibly. Friends of the Inyo would like to recommend the assessment of additional Research Natural Areas (or Botanical or Geological Areas if appropriate) in snowbank aspens, sagebrush steppe and dry-forb-pumice meadows and carbonate areas of limestone canyons south of Westgard Pass. Each of these habitats are unique to the eastside and some are under threat due to climate change. RNA's, for example, provide an excellent opportunity for research that could expand the knowledge of our forest conditions. The Forest Service noted in the Overall section of Ecological Integrity of Terrestrial Ecosystems, there is a need for "plan direction that addresses habitat connectivity". One method for achieving this desired condition is the establishment of Zoological Areas. This designation is one tool for creating connectivity between migratory corridors. The White-Inyo Bridge is one such area in need of habitat connectivity protections. Lastly, we note some concern with the degree of active management in designated areas on the Inyo. Friends of the Inyo has expressed concern over illegal wooding and motor vehicle use in RNA's. In many cases this may be a product of inadequate signage. One example of needed change is fire management in the Indiana Summit RNA. Given the fuel loading and absence of recent fire activity in this area, there is a high potential for catastrophic wildfire. Inyo fire planners have expressed interest in using this area to examine fire ecology regimes on the eastside. In some cases, designated areas may require active management in order to retain the characteristics that make them unique. These actions should be evaluated for their concurrence with a given area's designation rational and area specific management goals.

Sincerely,

Jora Fogg
Friends of the Inyo