FRIENDS OF THE INYO
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Submitted via email: at rperloff@fs.fed.us

Re: Parker Bench Sage-Grouse Enhancement Project

Thank you for the opportunity to comment on the Parker Bench Sage-Grouse Habitat Enhancement Project. We welcome and support the Forest's proposed action to enhance Sage Grouse habitat in the imperiled Parker PMU. Friends of the Inyo supports the goal of conducting this work in the fall, after the breeding season and fledglings have dispersed.

Although the project description states removing small trees from approximately 1,100 acres, it may be useful to make the three unit maps and a further description of the project available online before scoping, so that the public can provide on-the-ground based comments. An example of this approach is the recent Swall and 395 median fuels projects.

Friends of the Inyo supports the conifer treatment protocol previously used by the Inyo National Forest for small conifers to be cut without the use of mechanical equipment and left on site to decompose. All treatments likely to promote cheatgrass, including the use of mechanical equipment, should be avoided. Native perennial grass cover is critically important in providing resistance to the invasion of cheatgrass. All habitat enhancement treatments should strive to reduce the potential for decreased cover of perennial grasses. Exotic species, particularly the annual grasses cheatgrass and medusahead constitute a significant threat to sagebrush communities, particularly as they promote wildfire and compete with and replace native sagebrush species. Friends of the Inyo believes any sage-grouse habitat enhancement should consider the risk of exotic species and strive to address them in the context of achieving ideal habitat conditions for sage-grouse.

Based on recent field visits to the sites, the fencing along the road south of Unit 2 is a four-tier barbwire fence in disrepair. Before or immediately following treatment, we recommend coordination with DWP to mark this fence to avoid sage grouse collisions, and ideally convert it to a let down fence. The north end of the Unit 2 boundary appears to have phase three conifer encroachment. Many trees in this area are mature, large, and close together which will complicate felling and leaving trees on site. We recommend the treatment boundary end where the large

mahogany grove begins, in the northern part of the polygon. At 37.87278 -119.12891 there are legacy fence posts along the DWP/USFS boundary, which could be used as perches for predators. Absent of archeological resource issues, these posts could be easily removed by crews when they are doing the treatment. It should be noted that the northern ridge has multiple mature conifer species including Jeffery pine, mountain mahogany, pinyon and juniper. Several legacy junipers are very old and consideration should be given to their presence. Finally, the DWP road currently ends at the USFS boundary. Beyond this point, the road has undergone restoration and Sagebrush type vegetation is growing back. This section of the road should remain closed during the project to ensure the continued success of restoration efforts. If feasible, crews working in this area should walk in to the treatment sites from the end of the open DWP road. Road restoration should occur immediately following the project in the event the road is used to access the unit.

We thank the Forest for conducting a thorough assessment of this project and prioritizing the recovery of the Parker Bench PMU. We look forward to seeing the results of the treatments.

Sincerely,

s/s Jora Fogg
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