

September 6, 2018

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Submitted via email: ericdvane@fs.fed.us

RE: Scoping Comments on Reds Meadow Hazardous Fuels Reduction Project

Range of Light Executive Committee and Friends of the Inyo are pleased to provide comments on the Reds Meadow Fuels Reduction Proposed Action. We recognize the importance of forest thinning to protect our communities from wildfires and the value of controlled burns for restoring fire to our Sierra Nevada landscapes. We also understand that this project will help create a safer escape route for the public should a fire start down canyon. We appreciate the Forest's decision to conduct an Environmental Assessment (EA) for this project, and view that process as an opportunity to address the range of impacts this project may have, conduct the necessary pre-treatment surveys, and scale back the proposed action and scope of work should it be warranted.

The Reds Meadow and San Joaquin canyon is a special place in many ways. The west side of the San Joaquin ridge is the gateway to Devils Postpile National Park and the Ansel Adams Wilderness. It is rich in plant biodiversity, with springs and meadows, old, slow growing conifers, and provides habitat for a variety of at-risk species. It is cooler in the canyon due to shade from the canyon walls and springs that can provide climate change refugia for wildlife. The east side of the canyon is a red fir forest where most of the Inyo forest is Lodgepole or Jeffrey Pine. The San Joaquin Ridge is a deer migration and wildlife corridor used by a variety of animals because it is one of the few low passes leading to the Sierra Nevada. Forests east of highway 395 may have different fuels reduction prescriptions than older and wetter forests just west of the crest. This project needs to be tailored to the unique ecosystem of the Reds Meadow area. In the face of climate change and the changing priorities of the agency forest

health and wildlife habitat should take precedence over the preservation of recreational infrastructure.

The EA should address the cumulative impacts on wildlife following the Reds Meadow Road Improvement Project. The widening of the Reds Meadow road will impact the section from the San Joaquin Ridge to the bottom of the San Joaquin River that is targeted for broadcast burning. Extensive human activity of both projects will have a significant impact on wildlife that pass through or use this area. The thinning, burning, and then road construction activities could negatively impact resident wildlife and alter the migration corridor.

More specifically, we request the EA to address the following points:

- Clarify if it is an underlying goal of this project to protect the town of Mammoth Lakes from a forest fire coming from the west, the direction of prevailing winds. This project is clearing a large area of the forest to protect campgrounds, stables and rustic cabins that are replaceable and don't represent a significant investment should they be lost to fire. There may be better ways to protect the town than to heavily treat the canyon. Consider an alternative that applies fuels reduction primarily for the health of the forest in the San Joaquin River canyon and then creates a firebreak for the town of Mammoth Lakes further east of the San Joaquin Ridge. The tree density on the east side of the San Joaquin Ridge is much higher than on the west side.
- Take into account the goals of the California Essential Habitat Connectivity Project and the California State Wildlife Action Plan. The San Joaquin ridge is a wildlife corridor with needed linkage to the Glass Mountains. Because it is a low pass, more species use it to cross into the Sierra Nevada.
- Conduct wildlife surveys before beginning treatment, including pine marten, California spotted owl (CSO), and goshawk surveys. A goshawk nest was observed near the Minaret Campground in a survey of forest sensitive species by the Inyo NF staff and Goshawks have been seen flying in the area, indicating a nest could be located nearby (DEPO staff, personal communication). Also, the west slope of the San Joaquin ridge is the preferred habitat of pine martens: unlogged, red fir. Porcupines (a vulnerable species in CA) are known to inhabit Agnew Meadows. Sooty grouse raise their chicks in and around the treatment area. Under the 2004 Framework the agency is required to conduct CSO surveys, given that occupancy is unknown at this time and CSO have historically occurred in this area.

Standard and Guideline 33 in the 2004 Amendment:

"Conduct surveys in compliance with the Pacific Southwest Region's survey protocols during the planning process when proposed vegetation treatments are likely to reduce habitat quality in suitable California spotted owl habitat with unknown occupancy. Designate California spotted owl protected activity centers (PACs) where appropriate based on survey results."

- Plan the timing of fuels reductions around what is best for wildlife and avoid the peak times for visitors. Spring is the denning and nesting season for many animals and summer is the peak season for visitors, leaving fall for fuels reduction work.

- Include rationale for assigning treatment types to the various areas. Some areas don't look like they need thinning (around Starkweather Lake) and some areas that are to be broadcast burn areas look like they should be thinned (dense forest along the Starkweather Trail). See photos below.
- Provide an economic analysis of how commercial sale of logs will recover the cost of the project.
- **Roadside Fuel Break:** Clarify the removal of dead and dying trees. Dead trees are part of the ecosystem and recycle nutrients back into the soil. Snags provide wildlife habitat. Some trees will need to be removed for the widening of the Reds Meadow Road and this project should be coordinated with that effort, based on that project's EA. We recommend a minimum amount of snags be left standing in the project area (see photo below)
- **Infrastructure Fuel Break:** The map shows that all of the national forest area at Agnew Meadows is to be cleared; not just around the stable and trailhead parking. Consider hand thinning this area followed by broadcast burning. We note that there are many dead and down firs on the hillside above the corral at the beginning of the high trail to the Clark Lakes.
- **Meadow/Riparian Restoration:** We appreciate the inclusion of meadow restoration in the proposed action. The EA should address the best available science on meadow restoration specifically with regard to aspen regeneration and biodiversity.
- **Forest Thinning Prescription:** We are supportive of mixed densities of trees and would also encourage a mixture of ages and sizes of trees. Large diameter trees are valuable to forest ecology and for carbon sequestration. We recommend reducing the 30" diameter cap to 24" for live trees. As noted above, it is not clear if the intention is to remove all dead trees, and/or if some snags will be retained. The EA should include retention of some snags and downed logs for wildlife objectives and nutrient recycling. Chickarees, a staple food source for Pine Martens, use broken Red Fir stumps and logs.
- White Bark Pine (a candidate for listing) should be retained wherever possible. Snags and old growth trees such as those in the photos below along the Starkweather Trail must be clearly marked as wildlife trees or have other labeling to ensure they are not cut.
- **Understory Burn/Hand Thin Prescription:** Please include in the EA specific burn prescription information and resource objectives. On the west slope of the San Joaquin Ridge below Minaret Vista, there is a mix of riparian meadows and shrubs in an open, red fir forest. It is unclear whether broadcast burning is necessary in areas with little fuels build up that have reoccurring avalanches.

- There are springs, seeps, and streams on the steep, west slope of the San Joaquin Ridge. The EA should include soil retention objectives and erosion mitigation techniques following burning. Erosion would add sediment to the streams and the San Joaquin River. Twenty-two miles of the middle fork of the San Joaquin River in the Reds Meadow valley is eligible as a Wild and Scenic River.
- Include invasive species risk and impact following the removal of fuels and burning in applicable areas. Include measures to prevent invasive plants from establishing post-treatment. Native plants and grasses dominate the slope from Minaret Vista to Starkweather Lake. Please address the potential for cheatgrass moving in after the understory treatment and soil disturbance from tree removal. It is well known that cheatgrass creates a huge fire risk, more than the current native grasses and flowers. No new species should be introduced, especially yellow star thistle. Invasive species control should be consistent with the pending Forest Plan.
- Consider public field trips to the treatment sites to educate the public and foster discussions about best approaches to this project.

Above all, we ask that wildlife surveys be done at the appropriate season, before treatment begins and project boundaries be adjusted if necessary. We understand the Forest Service must balance protecting structures and the public's recreational experience with protecting ecosystem integrity. Thank you for all the hard work you do to protect our forests and for the opportunity to provide comments.

Sincerely,



Lynn Boulton, Chair
Range of Light Group



Jora Fogg, Policy Director
Friends of the Inyo

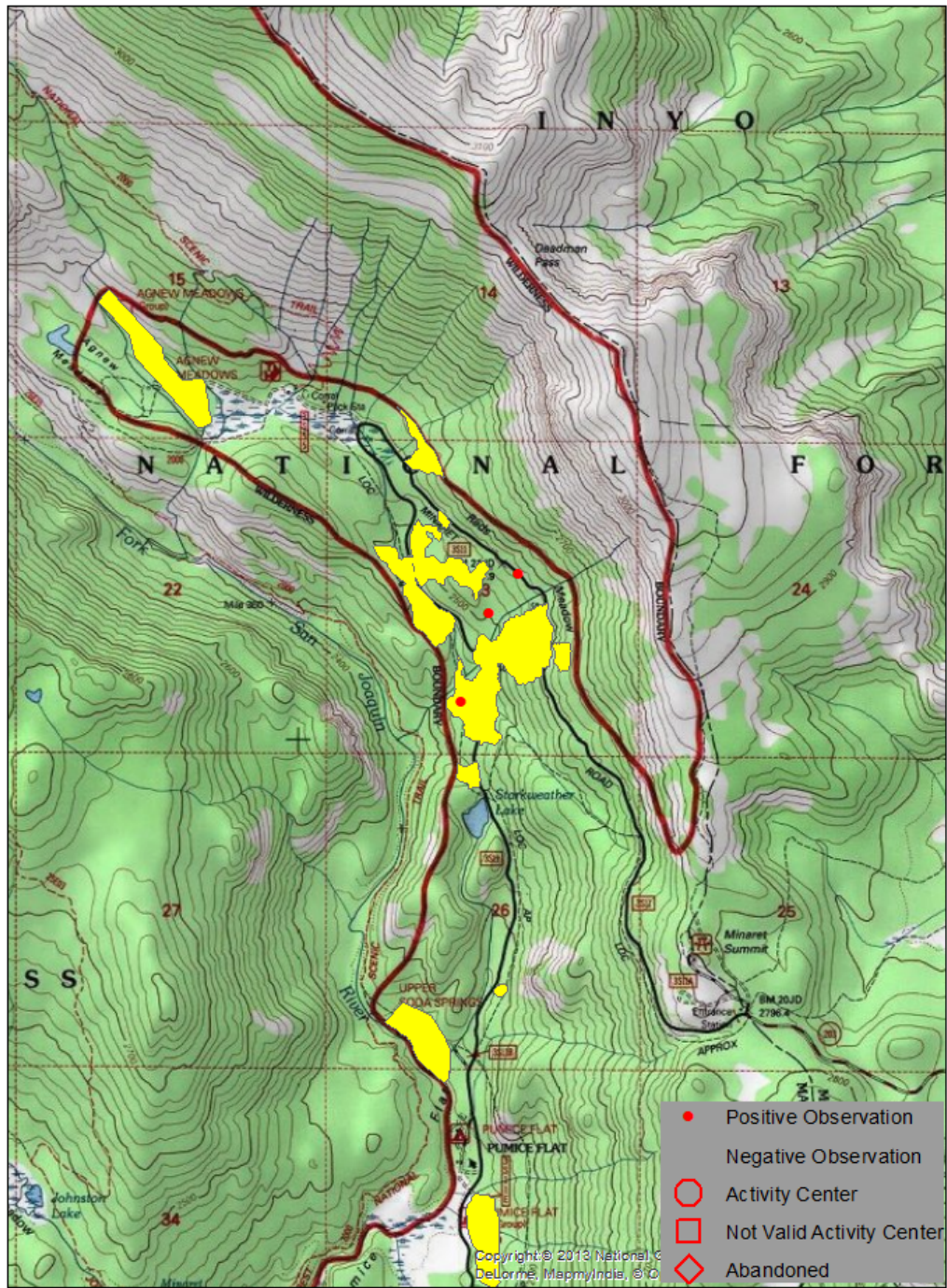


Figure 1. Historic California Spotted Owl detections within proposed project area (FACTS database)





Photo 1. Open forest above Starkweather Lake within the understory burn/hand thin project area

Photo 2. Wildlife snag within understory burn/hand thin area.

Photo 3. Open shrub and Mule's Ear in upper portion of understory burn/hand thin area.