



Friends of the Inyo  
819 N Barlow Ln  
Bishop, CA 93529

July 2, 2018

Mr. Mike Reynolds  
Superintendent, Death Valley National Park Service  
P.O. Box 579  
Death Valley, CA 92328

Via Electronic Transmission, Planning, Environment and Public Planning Comment  
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Re: Saline Warm Springs Environmental Impact Statement

Dear Superintendent Reynolds:

Friends of the Inyo is a Bishop, CA based grassroots conservation organization with over three decades of experience with public lands and wildlife in the Eastern Sierra and west Mojave within Inyo and Mono Counties. We represent over 800 members, many of who reside in the Eastern Sierra and recreate regularly in Saline Valley. An active stewardship partner with the Park, we recruit volunteers and carry out work such as the effacement of vehicle trespass at the Racetrack. We have a shared mission with the Park Service to advocate for natural resources management and sustainable recreation in remote areas of the park such as Saline Valley.

**Timbisha-Shoshone**

The Saline Valley Warm Springs have become an important place for many different people. Friends of the Inyo recommends that any management plan include reasonable access to the springs for the native population of the region. This community's cultural, spiritual, and practical connections to this area span millennia rather than decades. Friends of the Inyo has a long-standing relationship with the Timbisha-Shoshone tribe. While we of course cannot speak for the tribe, we know from discussions with tribal staff and members that the springs are culturally important to the tribe. We also understand that it is a priority of the Park to address traditional usage at the springs. Unfortunately

the current user group culture is sometimes at odds with traditional Timbisha Shoshone uses of the springs. To address this unfair situation, we recommend managers consult with the Timbisha-Shoshone Tribe when making decisions regarding restoration of the upper springs. We encourage an agreement that facilitates tribal access to both the upper and lower springs and advise that to achieve this it may be necessary to close the springs to general public use at certain times of the year. We request the tribe be an integral part of the planning process and their use and connection to this important site be recognized and incorporated. Education and outreach to the general public of this issue and the history of springs should also be incorporated in the management plan.

### **Non-native Species Management**

We understand the issue of non-native species such as planted grass and palm trees is a divisive one among the public and subject to interpretation of historical significance. The park must manage invasive species to be consistent with natural resource management prescriptions and objectives, however care should be taken to incorporate recreation and visitor experience. Particularly with respect to the existing palm trees, we do not recommend replacing them with cottonwood trees. Cottonwoods require ongoing and regular maintenance and are short-lived species, both of which will place financial burden on an already lean Park budget. There is also a liability issue with cottonwoods as they shed branches and limbs over time. A complete inventory of other invasive species in the area and an assessment of whether or not palms are negatively impacting the springs should be conducted. If consistent with tribal wishes, the palms at the upper springs should be removed to help restore those springs to their natural condition. Regardless of the park's course of action on non-native species, the EIS must clearly explain what actions will take place, with what methods, along with a timeline and follow up monitoring.

### **Burro Management**

We commend the Park for their efforts on Burro management and the Park's acknowledgment that the population at the springs needs to be addressed. We support the timely implementation of gatherings and follow up monitoring. It does not seem financially feasible to fence the entire recreational area of the springs and park resources are likely better spent in other areas of management of the springs. The situation with the current host feeding burros must be remedied immediately to facilitate effective burro management.

### **Recreation Management**

Due to the extreme popularity and increasing use of the springs, a visitor use study is needed to document how many people actually visit and camp, and how long they stay. We support efforts to manage human waste, food, and trash storage to avoid wildlife interactions. At Chicken Strip we suggest visitors pack out human waste or use wag bags. We remain concerned that visitor use is at a critical level now with many visitors staying past required time limits, creating overcrowding of campsites and overuse of associated facilities. A mandatory permit system would be ill advised given the site's remoteness, however a sign-in log should be maintained and hosts should check for a Park pass. It may be possible to implement a self-serve pay station in the future to help cover

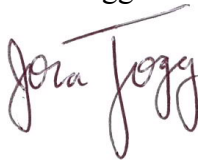
management costs. We recommend designated camping areas delineated by roads and signposts with maps and other user education targeted at regulatory, health & safety, compliance and Leave No Trace practices. These would include NPS sanctioned fire pits with host enforcement of no new individual fire rings or campsites.

Volunteer stewardship groups do an excellent job of caring for the springs and surrounding area but park managers must oversee, enforce and partner to limit growth, impact, and harm to wildlife, vegetation and other natural resources. Law enforcement presence may be necessary on busy holidays and weekends. We also recommend that no commercial activities take place within the valley.

We thank you for providing the opportunity to comment on the EIS and for your continued public outreach on this important management plan. Please reach out to us if we can be of any assistance in the planning process or with implementation of the plan.

Respectfully,

Jora Fogg

A handwritten signature in dark ink that reads "Jora Fogg". The signature is written in a cursive style with a long horizontal line above the first few letters.

Policy Director  
Friends of the Inyo

CC:

Mike Reynolds

Abigail Wines

Michelle Hamilton (Saline Preservation Association)

David Lamfrom (National Parks Conservation Association)