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Re: Invasive Plant Management Proposed Action

Friends of the Inyo (FOI) appreciates the opportunity to comment on the Invasive Plant Management Proposed Action (PA) for the Inyo National Forest. We are pleased to see the forest moving forward with plans to treat invasive species and the general approach presented in the PA. We support the treatment priorities (pg 5), as it is most efficient to treat areas with the most potential for eradication instead of areas that are so infested they may be difficult if not impossible to eradicate. There is also a need to focus on areas that are more vulnerable to spread or areas recovering from wildfire. Another treatment priority for special status areas should be special status species and their habitats, those that are particularly vulnerable to exotic plants. We also support and appreciate the emphasis on revegetation of native species and the monitoring timeframe.

We are concerned about the use of herbicides to treat invasive species, but believe for some species, in the appropriate locations is may be the best option for eradicating the population. One example is lower birch creek in the White Mountains, where Saltcedar is spreading rapidly despite past attempts are manual treatments. Although the use of glyphosate is not ideal in the riparian corridor, the future impacts to birch creek and its associated isolated population of Black Toad may outweigh the adverse effects of glyphosate application. Birch Creek should be a priority area for treatment as the current saltcedar population is manageable and the species has not yet reached the Black toad breeding area which would further complicate treatment options.

The PA does have a particular emphasis on the use of herbicides but does a good job of following integrated pest management practices by prioritizing mechanical treatments first for most species. We are concerned with the use of herbicides on public lands and see their use as a last resort. We support the manual removal of invasive plants within designated and recommended wilderness areas whenever possible. It would be helpful to know if the herbicide treatments within the Golden Trout Wilderness have been successful. This could be informative in how to proceed with invasive species removal in wilderness areas. The PA could also describe the use of new mechanical treatment technologies such as high-energy light wands, currently being used on DOD properties. In using the Best Available Science the PA should consider testing such equipment.

The design features for wildlife are sound but should also include an analysis of the possible impacts to listed species, especially amphibians (pg 20). Likely larger buffers around riparian, meadows and waterways are needed. In TES critical habitat herbicide application should be prohibited. We also recommend changing "occupied" bighorn sheep habitat to "critical" bighorn habitat (pg 21), as winter range habitat is not always occupied.

We hope the Environmental Assessment will include a discussion of climate change and drought on the spread of invasive species. Surprisingly, climate change is not mentioned once in the PA. There are also human-caused impacts that need addressing including, but not limited to, over-grazing and recreation. For some invasive species grazing allotments will need to be re-visited and recreation access limited until treatments are successful. The invasive species that have been introduced from pack stations such as Onion Valley's perennial pepperweed and McGee Canyon's cheatgrass are examples of changes in management that need to take place under this project.

Funding and resource constraints are always an issue, and the Environmental Assessment could develop cost-recovery strategies in places where project proponents are contributing to the spread of invasive species. The PA acknowledges the use of partnerships to increase treatment rates. Particularly the use of stewardship groups and organizations such as the California Native Plant Society should be explored in the PA. Other region 5 forests are using CNPS to address natural resources funding challenges.

Finally, the INF draft revised land management plan is referenced (pg 4), however there are inconsistencies between some plan components and what this PA projects. The draft forest plan projects 300 acres over 10 years (INV-FW-OBJ) whereas this PA projects 100-200 acres *per year*. The final Land Management Plan should be consistent with current and future project level planning or clarification is needed on how these projections differ.

Thank you for the opportunity to comment on this project and for the agency's proactive approach to invasive species management.

Sincerely,

/s/ Jora Fogg
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